

RCRA INSPECTION REPORT

USEPA #: 1L	D005109822	IEPA #: 0310240005
Facility Name:	CLARK OIL + REFINING CORP	Phone #: 708 3855000
Street Address:	13100 S KEDZIE	County: Cook
City:	BLUE ISLAND	State: IL Zip: 60406
Region: 2	Inspection Date: 6/26/96	From: 1000 To: 1030
Weather:	75°F	

TYPE OF FACILITY

TYPE OF FACILITY	
Notified As: <u>G</u>	Regulated As: <u>G</u>
LDF? <u>N</u> HPV? <u>N</u> <small>(Yes or No)</small>	90-Day F/U Required?: YES _____ NO <u>✓</u>

TYPE OF INSPECTION

TYPE OF INSPECTION

CEI: _____ Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

CME/O&M: _____ Record Review: _____ Follow-Up to Inspection of: 6-27-95 Withdrawal: _____

NON-REGULATED STATUS NA

NON-REGULATED STATUS N/A

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 8/18/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: 1/1/

Part A Withdrawal requested: 2/18/88 Approved by (USMIL) EPA: 2/18/94

PART B PERMIT APPLICATION NA

Part B Permit Submitted: Y or N ____/____/____ Final Permit Issued: ____/____/____

ENFORCEMENT NA

Has the firm been referred to - USEPA: Y or N ___/___/___
Illinois Attorney General: Y or N ___/___/___ County State's Attorney: Y or N ___/___/___

ORDERS ISSUED 14

ORDERS ISSUED *NA*

CACO: ____/____/____	CAFO: ____/____/____	Consent Decree: ____/____/____
Federal Court Order: ____/____/____	State Court Order: ____/____/____	IPCB Order: ____/____/____

TSD FACILITY ACTIVITY SUMMARY NA

[illegible]

RECEIVED

JUL 10 1996

IEPA-DLPC

SCREENED

0310240005 - Cook
Clark Oil & Refining Corporation
June 26, 1996

NARRATIVE

Prepared by James Haennicke

On June 26, 1996 a second follow-up inspection was conducted at Clark Oil & Refining Corporation (CORC) in Blue Island. This inspection was conducted to verify that soil contamination around Tank 51 was remediated and new valves and packing installed. During today's site visit, I met with Assistant Environmental Manager Elva Carusiello.

Three roll-off boxes of contaminated stones/soil have been excavated to date from around Tank 51. More material needs to be removed, however, the outstanding 21(a) violation will be resolved as remediation of contaminated soils at this facility is an ongoing practice and a part of general housekeeping. Whether or not new valves and packing had been installed could not be determined, however, an independent contractor's receipt for services was supplied during the May 22, 1996 Pre-Enforcement Conference.

VIOLATIONS RESOLVED

21(a) of the Act- No person shall cause or allow the open dumping of any waste. Soil contamination around Tank 51 has been and continues to be remediated.

97191001-49

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL 0005109822 IEPA #: 0310240005
 Facility Name: CLARK OIL & REFINING CORP Phone #: 708 385 5000
 Street Address: 13100 S KEDZIE County: COOK
 City: BLUE ISLAND State: IL Zip: 60906
 Region: 2 Inspection Date: 3/22/96 From: 9:30 AM To: 10:15 PM
 Weather: 40°F

TYPE OF FACILITY

Notified As: G Regulated As: G
 LDF? N HPV? N 90-Day F/U Required?: YES NO ☒

TYPE OF INSPECTION

CEI: Sampling: Citizen Complaint: Closed: Other:
 CME/O&M: Record Review: Follow-Up to Inspection of: 6/23/95 Withdrawal:

NON-REGULATED STATUS NA

SQG: Claimed Nonhandler: Other (Specify in Narrative):

PART A

Notification Date: 2/18/90, from (initial) or (subsequent) Notification.
 Initial Part A Date: 11/18/90 Amended:
 Part A Withdrawal requested: 2/18/88 Approved by (US/EPA): 2/18/94

PART B PERMIT APPLICATION NA

Part B Permit Submitted: Y or N
 Final Permit Issued:
 Enforcement NA

ENFORCEMENT NA

Has the firm been referred to - USEPA: Y or N
 Illinois Attorney General: Y or N
 County State's Attorney: Y or N

ORDERS ISSUED NA

CACO:
 CAFO:
 Consent Decree:
 Federal Court Order:
 State Court Order:
 IPCB Order:

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 12/90?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC. Sec.	On Annual Report		
							19	19	19

SCREENED

ADR - 4 1906

DJH

0310240005 - Cook
Clark Oil & Refining Corporation
March 22, 1996

NARRATIVE

Prepared by James Haennicke

On March 22, 1996 a follow-up inspection was conducted at Clark Oil & Refining Corporation (CORC) in Blue Island. This inspection was conducted to verify that soil contamination around Tank 51 and the Sludge Tank was remediated. During today's site visit, I met with Facility Environmental Manager Ronald Snook.

The ground contamination under the Sludge Tank has been removed and a concrete wall installed to act as secondary containment for potential spills. A small pooled area of oil contaminated water exists directly adjacent to the concrete wall. It was not ascertained whether or not this material was due to recent excavating activities or is present, in this form, in the groundwater. The liquid ^{will} be pumped to the wastewater treatment system when construction activities have been completed.

Contamination around Tank 51 is of a continuous nature. Contaminated soils noted during the June 23, 1995 inspection have been remediated, however, piping and pumps used to transport tank contents continue to leak onto surrounding ground media. According to Mr. Snook, tank integrity tests are performed when tanks are out of service. This information was not reviewed during the inspection. The following violation cannot be resolved until an adequate solution is found to address contamination to soils.

OUTSTANDING VIOLATIONS

21(a) of the Act- No person shall cause or allow the open dumping of any waste. Soil contamination exists around Tank 51.

RCRA INSPECTION REPORT

TYPE OF FACILITY**TYPE OF INSPECTION**

NON-REGULATED STATUS NA

PART A

PART B PERMIT APPLICATION NA

ENFORCEMENT NA

ORDERS ISSUED NA

TSD FACILITY ACTIVITY SUMMARY

RECEIVED
JUL 9 8 1995
HEPA-DLPC

SCREENED
JUL 1 9 1935

DJF

Clark Oil & Refining Corporation
0310240005
ILD005109822
6-23-95

NARRATIVE

Prepared by James Haennicke

Clark Oil & Refining Corporation (CORC) receives crude oil via pipeline and refines it to produce petroleum related products such as gasoline, naphtha, fuel oils, asphalt, and sulfur. Processes utilized include unfining, platforming, catalytic cracking, hydrocracking, and HF Alkylation.

HAZARDOUS WASTE GENERATED

Wastewater Treatment Residue

Dissolved Air Float (DAF)- K048 Float waste material
Slop Oil Emulsion Solids- K049 Emulsified oil interface from oil/water separator
API Separator Sludge- K051 Bottoms from API separator
Oil/Water/Solids Separation Sludge- F037 Waste solids from centrifugation unit

The above wastestreams are generated separately but combined during removal to create one wastestream. Approx 60 cubic yards generated 2-3 times per year when wastewater treatment unit is cleaned. Waste is shipped to LWD Inc in Calvert City, KY for incineration. No waste is accumulated on-site as it is removed directly from the units and shipped off-site concurrently.

Waste Petroleum Naphtha- D001,D018,D039

- Approx 200 gallons/month generated from 5 parts washers
- Waste is shipped monthly to Safety-Kleen in Dolton, IL for reclamation
- No waste is accumulated on-site

Hazardous Waste Solids- D018,F037,K049,K051

- Waste is generated during the clean out of process and petroleum tanks as needed
- Waste is shipped to LWD Inc in Calvert City, KY for incineration
- No waste is accumulating on-site

Contaminated Soil- U019

- One time generation due to benzene pipe leak
- Waste is shipped to LWD Inc in Calvert City, KY for incineration
- 2- 20 cubic yard roll-off boxes accumulating on-site

Spent Hydrocracking Catalyst- D018

- Generated yearly during routine maintenance of units
- Waste is shipped to LWD Inc in Calvert City, KY for incineration
- No waste is accumulating on-site

RECEIVED

JUL 03 1995

IEPA-DLPC

Monoethanolamine- D006,D008,D018

- Approx 5 gallons/month generated in parts washer
- Waste is shipped to Safety-Kleen in Dolton, IL for recycling
- No waste is accumulating on-site

SPECIAL WASTE GENERATED

Spent Catalysts

- Approx 20 cubic yards/month generated during renewal of catalysts
- Waste is shipped to County Environmental Landfill in Pontiac, IL
- Approx 20 cubic yards currently accumulating on-site

Asbestos

- Approx 25 cubic yards/month generated during repairs to buildings
- Waste is shipped to Woodland Landfill in South Elgin, IL
- No waste is accumulating on-site

Petroleum Contaminated Soil

- Approx 100 cubic yards/month generated during site clean-ups
- Waste is shipped to County Environmental Landfill in Pontiac, IL
- Approx 60 cubic yards accumulating on-site

WASTE MINIMIZATION

CORC now centrifuges its wastewater treatment wastes in order to remove more oil and water, thus reducing the amount of hazardous waste to be shipped off-site. The oil and water portion is fed back to the wastewater treatment unit.

NOTES

CORC's Container Storage Unit was closed in 1993. The Agency approved the closure and withdrew the Part A permit application in a letter dated February 18, 1994.

Three releases requiring the notification of the National Response Center (NRC) occurred at CORC in 1995. The first involved a March 13, 1995 fire in a building adjacent to the ISOMax Unit. A leak of a gasoline intermediate resulted in the formation of a vapor cloud that found an ignition source and caused a fire to occur. Waste generated was limited to construction debris, including asbestos, due to the fire.

The second release was benzene to the soil due to an underground pipe leak discovered on May 11, 1995. The remediation of the contaminated soil is still underway.

The third release involved a vapor release from the HF Alkylation Unit on May 16, 1995. The release was controlled via water spray which was subsequently directed to the facility's wastewater treatment system.

RECEIVED
JUL 03 1995

IEPA-DLPC

APPARENT VIOLATIONS

722.111- Waste determinations are needed for the soil contamination to the north and west of Tank 51 and under the Sludge Tank located in the wastewater treatment unit area (See photos 6-8).

21(a) of the Act- No person shall cause or allow the open dumping of any waste. Soil contamination at Tank 51 and Sludge Tank (See photos 6-8).

971910013

RECEIVED

JUL 03 1985

IEPA-DLPC



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
OPEN DUMP INSPECTION REPORT

JUL 07 1994

L.E.P.A.
STATE OF ILLINOIS

County COOK Site Code 0310240003
Location/Name BLUE Island / CLARK OIL REFINING Date JUNE 6, 1994
Time: From 09:30 A m To: 10:45 a m Region MAYWOOD
Photos Taken: Yes (# 3) No () RP's phone # 708/385-5000
Inspector(s) AARON TAYLOR Weather Clear, Approx 85°
Samples Taken: Yes (#) No (X) Type _____
Interviewed BOB LIANES Previous Inspection APRIL 13, 1994

SITE OBSERVATION

- Causing or allowing litter (Section 21(p)(1) of the Act) 1* _____
- Causing or allowing scavenging operations (Section 21(p)(2) of the Act) 2* _____
- Causing or allowing open burning (Section 21(p)(3) of the Act) 3* _____
- Causing or allowing the deposition of waste in standing or flowing waters
(Section 21(p)(4) of the Act) 4* _____
- Causing or allowing proliferation of disease vectors
(Section 21(p)(5) of the Act) 5* _____
- Causing or allowing the generation of standing or flowing liquid discharge
from the open dump site (Section 21(p)(6) of the Act) 6* _____
- Causing or allowing the operation of an open dump so as to cause or threaten
or allow the emissions of contaminants so as to cause or tend to cause air
pollution in Illinois (Section 9(a) and 9(c) of the Act) 7. _____
- Causing or allowing the operation of an open dump so as to cause or threaten
or allow the discharge of any contaminants so as to cause water pollution
in Illinois (Section 12(a) and 12(d) of the Act) 8. _____
- Acceptance of special waste for disposal, storage or treatment from a waste
hauler that does not have a valid waste hauling permit (Section 809.302(a)
of the Regulations) 9. _____

Acceptance of special waste for disposal, storage or treatment from a waste hauler that did not present a signed manifest which designated the receiver's facility as a destination for the special waste (Section 809.302(a) of the regulations) 10.____

Causing or allowing the development and/or operation of a solid waste management site without a permit issued by the Agency (Sections 807.201 and 807.202 of the Regulations) 11.____

Causing or allowing the open dumping of any waste (Section 21(a) of the Act) 12.____

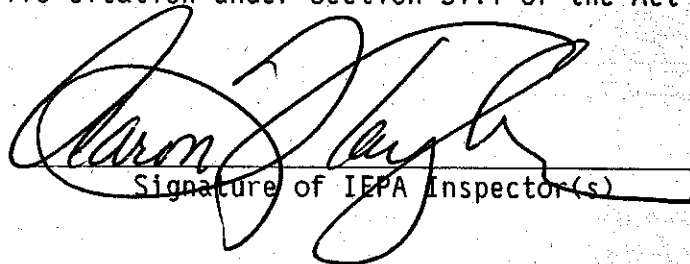
Conducting any waste-storage, waste-treatment, or waste-disposal operation without a permit granted by the Agency (Section 21(d) of the Act) 13.____

Apparent violation of: PCB (); Circuit Court ()
Case Number _____, Order entered on _____, 19____ 14.____

Other 15.____

INFORMATIONAL NOTES

1. Reference to "Act" herein refer to the Illinois Environmental Protection Act: Ill. Rev. Stat. ch. 111 1/2, par. 1001, et seq.
2. Reference to "Regulations" herein refer to the rules and regulations of the Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers.
- *. Subject to enforcement either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.


Signature of IEPA Inspector(s)

GS:jar/0265r,1-2/sp

0310240005/Cook County
Clark Oil & Refinery
June 6, 1994

NARRATIVE

On June 6, 1994, a follow-up inspection was conducted at the above referenced facility to determine if the violations cited during the April 13, 1994 inspection had been resolved and to find out Clark's reason for refusing to accept the PECL dated May 20, 1994.

Upon arrival at the facility, I met and interviewed Mr. Robert Llanes, of Clark's environmental staff. During the interview Mr. Llanes stated that the clean up of the catalyst had been accomplished by scraping up the first few inches of soil and placing it in a roll off box until the soil analysis results were done. When the results came back the soil was taken to CID landfill for disposal. Llanes stated that PECL was inadvertently refused due to a mix-up. The front gate guards who are responsible for accepting the mail thought that the certified letter had postage due on it and so they refused to accept it. The front gate personnel have now been given strict instructions not to refuse any mail that comes.

During the inspection, I observed that all of the material that had been dumped was removed. Llanes provided copies of the manifest and waste analysis (see attachments).

APPARENT VIOLATIONS

At the time of inspection, no apparent violations were observed and the facility may be returned to compliance.

RECEIVED
JUL 14 1994
IEPA-DLPC



PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD 005 109 822	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address Clark Refining & Marketing, Inc. 131st Street & Kedzie Ave., Blue Island, IL 60406		Location If Different				
4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* 708/ 385-5000		6. US EPA ID Number				
5. Transporter 1 Company Name Independent Waste Systems, Inc.		8. US EPA ID Number				
7. Transporter 2 Company Name		10. US EPA ID Number				
9. Designated Facility Name and Site Address CID Landfill 138th St. & Calumet Expressway Calumet City, IL 60409		10. US EPA ID Number				
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	
a. Non Hazardous By DOT, Sulfur, Catalysts Sand, Clay & Oil		001	CM	00012	Y	
b.						
c.						
d.						
15. Special Handling Instructions and Additional Information Emergency Telephone Number (708) 385-5000 If undeliverable, return to generator. Bill to P.O. Number: # 835194						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Robert Llanes		Signature Robert Llanes		Date 5/12/94		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Jim Penilla		Signature Jim Penilla		Date 5/12/94		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Date		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Signature		Date		
Printed/Typed Name		Signature		Month Day Year		

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 6. GENERATOR'S COPY



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
708/967-6666
FAX: 708/967-6735

LABORATORY REPORT

95460-A

Clark Oil Corporation
131st & Kedzie Avenue
Blue Island, IL 60406

Report Date: 5/2/94
Sample Received: 4/25/94

Sample Description: Soil Grab, 20B
Sample No.: 79729

<u>Compounds</u>	<u>Concentration Found In</u>		<u>Adjusted Concentration</u>	<u>Method</u>	<u>Regulatory Limit</u>
	<u>Sample</u>	<u>Blank</u>		<u>Detection Limit (MDL)</u>	
1. Benzene	<0.25	<0.01	<0.25	0.01	0.50
2. Carbon Tetrachloride	<0.25	<0.01	<0.25	0.01	0.50
3. Chlorobenzene	<50.0	<0.01	<50.0	0.01	100.00
4. Chloroform	<3.0	<0.01	<3.0	0.01	6.00
5. o-Cresol	<100.0	<0.01	<100.0	0.01	200.00
6. m-Cresol	<100.0	<0.01	<100.0	0.01	200.00
7. p-Cresol	<100.0	<0.01	<100.0	0.01	200.00
Total Cresol	<100.0	<0.01	<100.0	0.01	200.00
8. 1,4-Dichlorobenzene	<3.75	<0.01	<3.75	0.01	7.50
9. 1,2-Dichloroethane	<0.25	<0.01	<0.25	0.01	0.50
10. 1,1-Dichloroethene	<0.35	<0.01	<0.35	0.01	0.700
11. 2,4-Dinitrotoluene	<0.07	<0.01	<0.07	0.01	0.13
12. Hexachlorobenzene	<0.07	<0.01	<0.07	0.01	0.13
13. Hexachloro-1,3-butadiene	<0.25	<0.01	<0.25	0.01	0.50
14. Hexachloroethane	<1.50	<0.01	<1.50	0.01	3.00
15. Methyl Ethyl Ketone	<100.0	<0.01	<100.0	0.01	200.00
16. Nitrobenzene	<1.00	<0.01	<1.00	0.01	2.00
17. Pentachlorophenol	<50.00	<0.01	<50.0	0.01	100.00
18. Pyridine	<2.50	<0.01	<2.50	0.01	5.00
19. Tetrachloroethylene	<0.35	<0.01	<0.35	0.01	0.70
20. Trichloroethylene	<0.25	<0.01	<0.25	0.01	0.50
21. 2,4,5-Trichlorophenol	<200.00	<0.01	<200.00	0.01	400.00
22. 2,4,6-Trichlorophenol	<1.00	<0.01	<1.00	0.01	2.00
23. Vinyl Chloride	<0.10	<0.01	<0.10	0.01	0.20

All results expressed as ppm unless otherwise indicated.

Methods performed according to SW-846, "Test methods for Evaluating Solid Waste".

Analysis performed on Extract from TCLP.

Leah E. Zehn

LABORATORY DIRECTOR



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
708/967-6666
FAX: 708/967-6735

LABORATORY REPORT

95460

Clark Oil Corporation
131st & Kedzie Avenue
Blue Island, IL 60406

Report Date: 4/29/94
Sample Received: 4/25/94

Sample Description: Soil Grab, 20B
Sample No.: 79729

@ 127th Wacker Drive

Open Cup Flash Point	>180°F.
Reactive Cyanide	<5.0
Reactive Sulfide	<5.0
pH (10% Solution)	7.9 (units)

Analysis Performed On Extract From TCLP

Arsenic	<0.2
Barium	0.44
Cadmium	<0.02
Chromium	<0.1
Lead	<0.1
Mercury	<0.01
Selenium	<0.2
Silver	<0.2

All results expressed as ppm unless otherwise indicated.

Methods performed according to SW-846, "Test Methods for Evaluating Solid Waste".

LABORATORY DIRECTOR



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: 6/6/94 Inspector: AARON TAYLOR
Site Code: 0310240005 County: COOK
Site Name: CLARK OIL & REFINING Time: 9:30 AM - 10:45 AM

NOT DRAWN TO SCALE

OWNER

OPERATOR

Name **CLARK OIL REFINING**
 Address **8182 MARYLAND**
 City **ST. LOUIS**
 State **MO** Zip **63105**
 Phone # **314/854-9696**

Name **CLARK OIL REFINING**
 Address **131ST AND KEDZIE**
 City **BLUE ISLAND**
 State **IL** Zip **60406**
 Phone # **708/385-5000**

PERSON(S) INTERVIEWED

TITLE

PHONE #

RON SNOOK**ENVIRONMENTAL MGR****708/385-5000**

INSPECTION PARTICIPANT(S)

AGENCY/TITLE

PHONE #

AARON TAYLOR**IEPA/EPs****708/338-7900**

PREPARED BY

AGENCY/TITLE

PHONE #

AARON TAYLOR**IEPA/EPs****708/338-7900**

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
SEVERAL NON-RCRA VIOLATIONS OBSERVED		

Area	Class	Section

Area	Class	Section

RECEIVED

MAY 09 1994

IEPA-DLPC

FILE NO. L 0 3 1 0 2 4 0 0 0 5

WITHHELD DOCUMENT NO. 0 1 0

*The original copy of this document
is contained in the withheld package.*

**WITHHELD
DOCUMENT**

FILE CATEGORY fos

DOCUMENT DATE 3/30/94

DLPC COMPLAINT INVESTIGATION FORM

9310240005 - Cook Co
FPA ID # County
Clark Oil & Refining
Site Name
IL1005109822 Complaint #: C94-206 N

USEPA ID #
FOS

Date Recvd: 3/30/94 By: CH By Phone: X In Person: By Mail:
Complainent: Respondent: Clark Oil & Refining
Address: 13100 S Kedzie Ave
Blue Island 60406
Telephone: 708/385-5000

Directions to Source: Need to contact complainent to act as guide to location

Complaint Details: Complainent saw a red "tank truck" dumping in a field on or near the Clark Oil refinery in Blue Island. Material was "steaming" on ground. Truck had Haz Mat placards on it. This happened about 10 days ago (3/20?)

INVESTIGATION FINDINGS

Date Invest: 4/13/94 Time From: 10:30 AM To: 11:15 AM Inspector: Aaron Taylor 4 Photos
Interviewed: Bob Kittl, Ron Smock Weather: Old Cldy approx 45°F
Remarks:

See Open dump report dated 4/13/94

Complainent Notified of Findings? Yes: No: Findings Entered into Computer:

CC: Northern Region

DIVISION FILE

95th 7/18/94

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL 0005109822 | IEPA #: 0310940005
 Facility Name: CLARK OIL AND REFINING Phone #: 708/385-5000
 Street Address: 131st and KEDZIE County: COOK
 City: BLUE ISLAND State: IL Zip: 60406
 Region: MAYWOOD Inspection Date: 12/6/93 From: 10:00 AM To: 12:15 PM
 Weather: OVERCAST, CLDY

TYPE OF FACILITY

Notified As: GTSD Regulated As: GENERATOR (T)(S)(D)
 LDF? NO HPV? NO 90-Day F/U Required?: YES NO X

TYPE OF INSPECTION

CEI: X Sampling: Citizen Complaint: Closed: Other:
 CME/O&M: Record Review: Follow-Up to Inspection of: Withdrawal:

NON-REGULATED STATUS

SQG: Claimed Nonhandler: Other (Specify in Narrative):

PART A

Notification Date: 8/18/80, from (initial) or (subsequent) Notification.
 Initial Part A Date: 11/18/80 Amended: 1/1/88
 Part A Withdrawal requested: 2/18/88 Approved by (US)(IL) EPA: 1/1/88

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N 5/6/88 Final Permit Issued: 1/1/88

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N 1/1/88 JAN 25 1994
 Illinois Attorney General: Y or N 1/1/88 County State's Attorney: Y or N 1/1/88
 EPA-ILDC

ORDERS ISSUED

CACO: 1/1/88 CAFO: 1/1/88 Consent Decree: 1/1/88
 Federal Court Order: 1/1/88 State Court Order: 1/1/88 IPCB Order: 1/1/88

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1990?	Was Activity Ever Done?	Closed	Being done at Time of Insp?	Exempt per 35 IAC. Sec.	On Annual Report		
							1992	1991	1990
S01	YES	UNKNOWN	YES	NO	NO	NA	NA	NA	NA
S02	↓	↓	NO	↓	↓	↓	↓	↓	↓
T01	↓	↓	↓	↓	↓	↓	↓	↓	↓
T04	↓	↓	↓	↓	↓	↓	↓	↓	↓

* CLOSURE VERIFICATION INSPECTION ALSO DONE.
 HOWEVER SITE NOT OFFICIALLY CLOSED UNTIL APPROVAL
 LETTER IS SENT OUT.

0310240005/COOK
CLARK OIL & REFINING
ILD005109822

NARRATIVE

On December 6, 1993, I conducted a Closure Verification Inspection at the above referenced facility to determine if the site had been close in accordance with the closure plan submitted to the Agency 12/23/93.

Upon arrival at the site, I met and interviewed Mr. Stafford Jacques, Clark's Assistant Director of Environmental Control, who stated that during the clean up no hazardous material was generated, therefore no manifest were used. Once the soil samples came back clean, the soil that had been removed from the former S01 unit was disposed of with the general refuse. The decontamination waters were also held pending the return of lab results and then disposed of in Clark's permitted wastewater pretreatment system.

During the inspection of the S01 unit, I observed that there was no waste stored in the unit and the flags indicating the places where the soil borings were taken for sampling were still in place.

Based on this inspection, it appears that Clark Oil has closed it's S01 facility in accordance with the closure plan approved by the agency.

RECEIVED
JAN 11 1994
IEPA-DLPC

0310240005/COOK COUNTY
CLARK OIL & REFINING
ILD005109822
12/6/93

RECEIVED

JAN 25 1994

IEPA-DLPC

NON-HAZARDOUS WASTE GENERATED

Sulfur Catalyst, Sand, Clay, and Oil- generated from the cleanup of spills. Sent to CID landfill for disposal.

HAZARDOUS WASTE PROCESS UNIT

S01-Container storage unit also had a closure verification inspection done at the time of this inspection. There were no containers stored in the area. The flags indicating the places where the soil borings were taken were still in place. No hazardous waste was generated during the cleanup, therefore, no manifests were used. Clark Oil appears to have closed the S01 unit in accordance with the closure plan approved by the agency. No apparent violations were observed during the inspection.

NOTE : Camera malfunctioned during inspection and only the photo of the waster treatment tanks was able to be processed by the photo lab.

95031000216

RCRA INSPECTION REPORT

TYPE OF FACILITY**TYPE OF INSPECTION**

NON-REGULATED STATUS

PART A

PART B PERMIT APPLICATION

ENFORCEMENT

ORDERS ISSUED

TSD FACILITY ACTIVITY SUMMARY

DL 532-1834

1584 101 20

WASTE DISPOSITION FORM

Facility Name: CLARK OIL & REFINING CORP
 USEPA #: 12 0005109222
 IEPA #: 0310240005

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #				On Annual Report for: (Circle if present; cross out if not present)				Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12		* On 3510.3		* 19 84		* 19 88				
			Y	Y	G	F	G	F	G	F			
DISSOLVED AIR FLOTATION FLOAT (DAF)	RESIDUAL MATERIAL FROM WASTEWATER TREATMENT	10-17-90 K04P	Y	Y	G	G	G	G	G	0	11-14-91	POLLUTION CONTROL INDUSTRIES - E-CHIC, IL OR	
SLOP OIL EMULSION SOLIDS	EMULSIFIED OIL INTERFACED FROM OIL/WATER SEPARATOR	K049			G	G	G	G	G	0		AVIATICS - TEXARKANA, IL FOR FUEL BLENDING	
HEAT EXCHANGER BUNDLE CLEANING	CLEANING HEAT EXCHANGERS	K050			G	G	G	G	G	0			
API SEPARATOR SLUDGE	BOTTOMS FROM API SEPARATOR	K051			G	G	G	G	G	0			
BENZENE CONTAMINATED SOIL	HOSE LEAK	10-14-91	NA	NA	G	G	G	G	G	0	11-14-91	PEORIA DISPOSAL PEORIA, IL	
WASTE PETROLEUM NAPHTHA	PARTS WASHOR	DOO1, 12, 39	NA	NA	G	G	G	G	G	0	9-23-91	SAFETY-KLEEN MOKENA, IL	
1,1,1 TRICHLORO-ETHANE		FOO1	NA	NA	G	G	G	G	G	0	9-12-91	MIXED W/ K WASTES	
					G	G	G	G	G				
					G	G	G	G	G				
					G	G	G	G	G				
SULFUR CATALYST, SAND, CLAY, OIL	SPILLS	8-91 NA			G	G	G	G	G		VARIES	CID LANDFILL CALUMET CITY, IL	

* All "NO" responses must be explained in narrative.

Clark Oil & Refining Corporation
0310240005
11-15-91

NARRATIVE

Clark Oil receives crude oil via pipeline , refines it, and produces petroleum-related products: gasoline, #2 & #6 fuel oils, liquefied petroleum gas, asphalt, and sulfur.

HAZARDOUS WASTES GENTERATED

Dissolved air flotation (DAF) float- K048- Redisual material from wastewater treatment.

Slop oil emulsion solids- K049- Emulsified oil interface from oil/water separator.

Heat exchanger bundle cleaning- K050- Residual material from cleaning heat exchangers.

API separator sludge- K051- Bottoms from API separator.

* Although the above 4 wastestreams are generated separately, all are combined and interconnected within the wastewater treatment unit. Approximately 10,000 gallons/month generated and shipped to Pollution Control Industries- East Chicago, IN or Avganics- Terrehaute, IN for fuel blending. Waste never accumulated on-site as it is removed directly from the process unit and shipped off-site immediately.

Waste petroleum naphtha- D001,18,39- Safety-Kleen parts washer. Twelve gallons/month generated. Manifested to Safety-Kleen in Mokena, IL.

1,1,1-trichloroethane- F002- Used as a degreaser in the electrical and machine shops. Approximately 1 drum generated every 3 months. Mixed with K wastes and fuel blended. Waste never accumulated since it is used in the shops up until the time it is mixed with the K wastes.

Benzene contaminated soil- U019- Leak from barge hose (product of adjacent company). One time occurrence. Manifested to Peoria Disposal in Peoria, IL. None on-site.

NON-HAZARDOUS WASTE GENERATED

Sulfur catalyst, sand, clay, oil- Generated from clean-up of spilled asphalt, etc. Shipped to CID Landfill in Calumet City, IL. None on-site.

Clark Oil & Refining Corporation
0310240005
11-15-91

HAZARDOUS WASTE PROCESS UNIT

S01- Container storage area. Located on the western end of the site's property adjacent to tank 801. Outdoor unit with soil base covered with gravel. No waste currently stored in this area. Closure plan submitted and received by the Agency on 10-30-91.

This facility is currently operating as a fully regulated generator.

No violations observed during this inspection.

CLARK OIL & REFINING Corporation

BLISS ISLAND, ILLINOIS

FIRE SYSTEM ROADWAY TANK & UNIT LOCATIONS OF REEDZIE AVENUE

DRAWN BY: SCHEMATE DATE: 12-28-77 CHKD: SCALE NONE

W-60-01

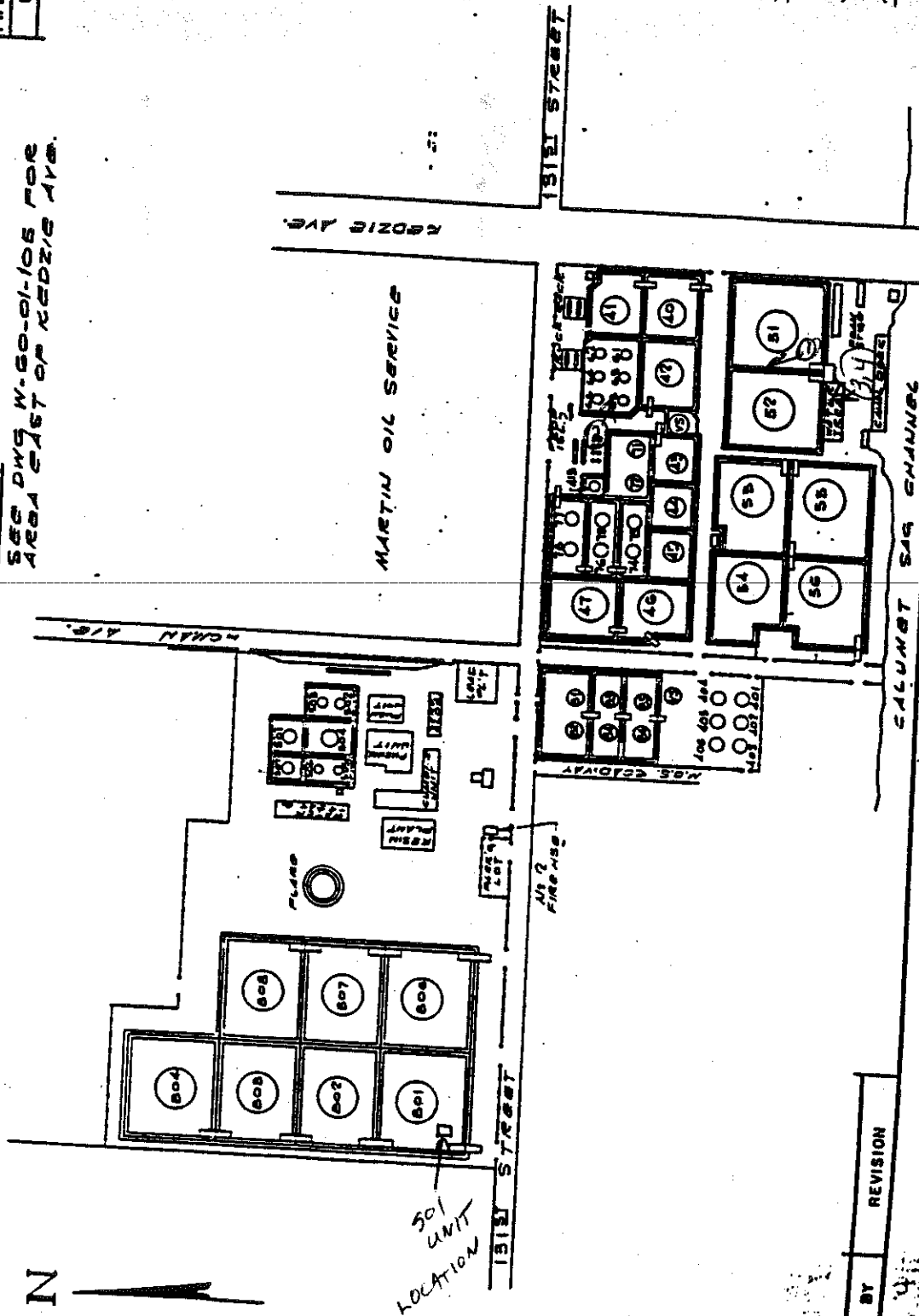
PIPING CLASS

LINE No.

INSUL

NOTES:

SEE DWG W-60-01-106 FOR AREA EAST OF REEDZIE AVE.



501 UNIT LOCATION

0310240005
11-15-91

NO.	DATE	BY	REVISION

RCRA INSPECTION REPORT

USEPA #: 1L 0 1 5 1 6 1 1 2 2 IEPA #: 0 1 5 1 6 1 1 2 2
 Facility Name: CLARK HILL DEFENSE CORP Phone #: 608 312 4111
 Street Address: 31st & KEDZIE AVE County: Cook
 City: Chicago State: IL Zip: 60646
 Region: 2 Inspection Date: 1/2/87
 Weather: 40 F From: 8:00 To: 3:30

TYPE OF FACILITY

Notified As: SITCD TYPE OF FACILITY
Regulated As: G (1)
LDF? YES HPV? YES 90-Day F/U Required?: YES
(YES or NO)

TYPE OF INSPECTION

CE: Sampling: Citizen Complaint: Closed: Other:
CME/O&M: Record Review: Follow-Up to Inspection of: Withdrawal:

NON-REGULATED STATUS

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART 4

Notification Date: 8/18/80, from (initial) or (subsequent) Notification.
Date: 1/1/81

Initial Part A Date: 11/18/80

Amended: / /

Part A Withdrawal requested: 212122

Approved by (US)(IL) EPA: _____ / _____ / _____

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N

Final Permit Issued: _____ / _____ / _____

ENFORCEMENT

Has the firm been referred to --

USEPA: Y or N / /

Illinois Attorney General: Y or N

County State's Attorney: Y or N _____ / _____ / _____

ORDERS ISSUED

CACO: / /

CAFO: / /

Consent Decree: / /

Federal Court Order: / /

State Court Order: _____ / _____ / _____ IPCB Order: _____ / _____ / _____

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report		
							1980	1981	1982
SC1	YES	UNKNOWN	YES	NO	NO	NA	NA	NA	NA
SC2	↓	↓	NO	NA	↓	↓	↓	↓	↓
TC1	↓	↓	↓	↓	↓	↓	↓	↓	↓
TC4	↓	↓	↓	↓	↓	↓	↓	↓	↓

RECEIVED
11 DEC 1991

IL 633-1834

Clark Oil & Refining Corporation
0310240005
11-15-91

HAZARDOUS WASTE PROCESS UNIT

S01- Container storage area. Located on the western end of the site's property adjacent to tank 801. Outdoor unit with soil base covered with gravel. No waste currently stored in this area. Closure plan submitted and received by the Agency on 10-30-91.

This facility is currently operating as a fully regulated generator.

No violations observed during this inspection.

9 5 0 8 1 0 0 0 1 7 3

CLARK OIL & REFINING

SUE BLANK, JUNOS

Corporation

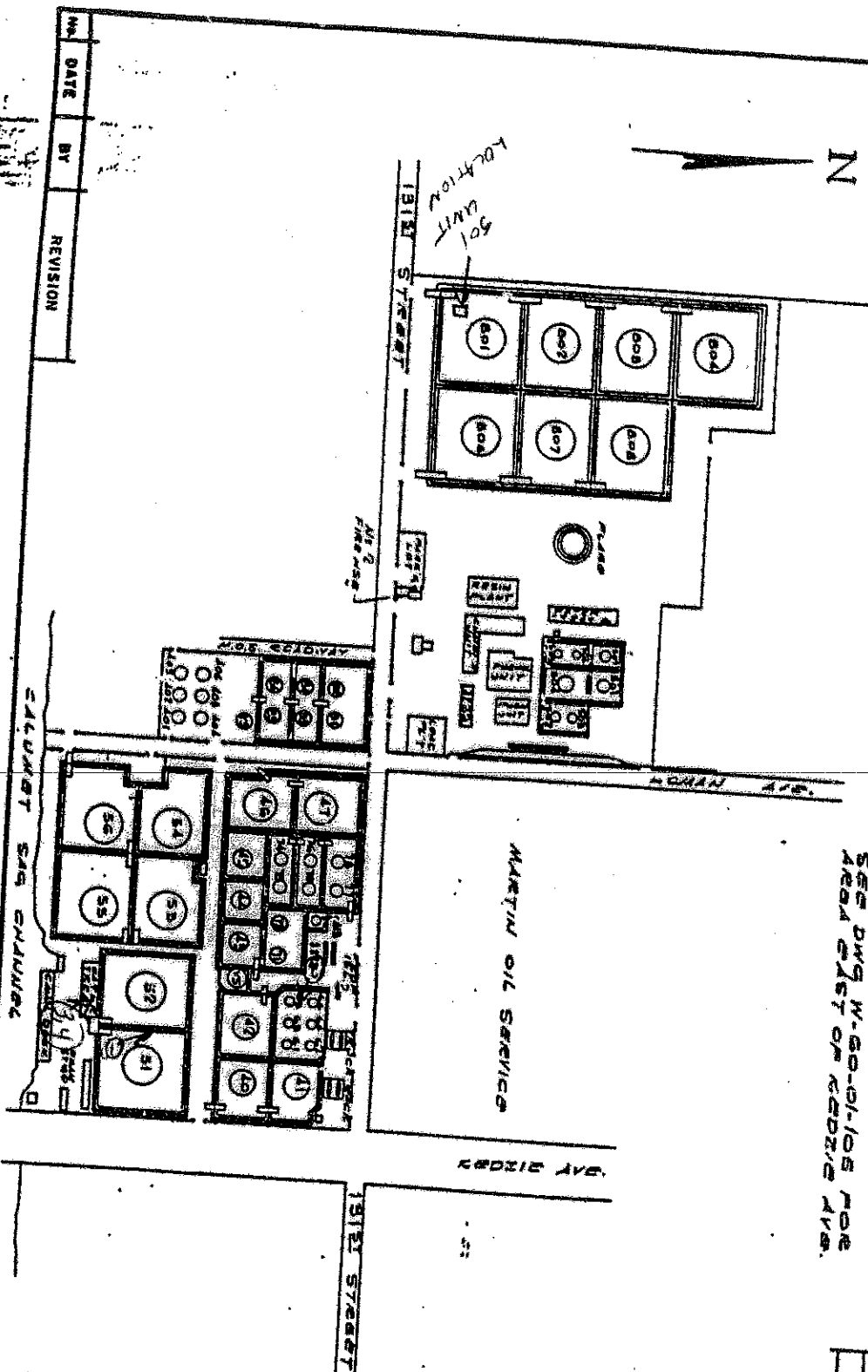
FIRE SYSTEM
ROADWAY TANK & PUMP LOCATIONS
 DRAWN BY S. C. BLANK
 DATE 12-22-17

CHRD. SCALE None

W-60-01

NOTE:
 SEE DWG W-60-01-105 FOR
 AREA EAST OF REDDIE AVE.

PIPING CLASS
 LINE No. INCH



NO.	DATE	BY	REVISION

0810240005
 11-15-41

Illinois Environmental Protection Agency
Division of Land Pollution Control

INSPECTION REPORT

USEPA #: IL <u>D 005109822</u>	EPA #: <u>0310240005</u>
Facility Name: <u>Clark Oil & Refining Corp.</u>	Phone #: <u>708/385-5000</u>
Street Address: <u>131st & Kedzie Ave.</u>	County: <u>Cook</u>
City: <u>Blue Island</u>	State: <u>IL</u> Zip: <u>60406</u>
Region: <u>2</u>	Inspection Date: <u>2/1/91</u> From: <u>9:30am</u> To: <u>11:15am</u>
Weather:	

TYPE OF FACILITY

Notified As: <u>G, TSD</u>	Regulated As: <u>G (s)</u>
<u>No</u> LDF? (Yes or No) <u>No</u> HPV?	90-Day F/U Required?: YES <u> </u> NO <u>X</u>

TYPE OF INSPECTION

RCRA: <u>X</u>	Sampling: <u> </u>	Citizen Complaint: <u> </u>	Closed: <u> </u>	Other: <u> </u>
Record Review: <u> </u>	Follow-Up to Inspection of: <u> </u>	Withdrawal: <u> </u>		

NON-REGULATED STATUS

SQG: <u> </u>	Claimed Nonhandler: <u> </u>	Other (Specify in Narrative): <u> </u>
--------------------	-----------------------------------	---

PART A

Notification Date: <u>8/18/80</u> , from <u>(initial)</u> or (subsequent) Notification.
Initial Part A Date: <u>11/18/80</u> Amended: <u> </u> / <u> </u> / <u> </u>
Part A Withdrawal requested: <u>2/18/82</u> Approved by (US)(IL) EPA: <u> </u> / <u> </u> / <u> </u>

PART B PERMIT APPLICATION

Part B Permit called by (US)(IL) EPA on: <u>5/6/88</u>	Permit Due: <u>11/8/88</u>
Part B Permit Submitted: <u> </u> / <u> </u> / <u> </u>	Draft Permit Issued: <u> </u> / <u> </u> / <u> </u>

ENFORCEMENT

Has firm been referred to:	USEPA? <u>No</u>	IAG? <u>No</u>	County SA? <u>No</u>
Date(s) of initial referral:	<u> </u> / <u> </u> / <u> </u>	<u> </u> / <u> </u> / <u> </u>	<u> </u> / <u> </u> / <u> </u>
USEPA CACO: <u> </u> / <u> </u> / <u> </u>	CAFO: <u> </u> / <u> </u> / <u> </u>	ALJ Decision: <u> </u> / <u> </u> / <u> </u>	
Referral to DOJ by USEPA: <u> </u> / <u> </u> / <u> </u>	Federal Court Order Issued: <u> </u> / <u> </u> / <u> </u>		
PCB Order Issued: <u> </u> / <u> </u> / <u> </u>	State Court Order Issued: <u> </u> / <u> </u> / <u> </u>		

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1990?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report		
							90	89	88
S01	Yes	Unknown	Yes	No	No	N/A	N/A	N/A	N/A
S02	Yes	Unknown	No	N/A	No	N/A	N/A	N/A	N/A
T01	Yes	Unknown	No	N/A	No	N/A	N/A	N/A	N/A
T04	Yes	Unknown	No	N/A	No	N/A	N/A	N/A	N/A

RECEIVED

28 MAR 1991

IEPA/DLPC

SUMMARY OF APPARENT VIOLATIONS

OWNER

OPERATOR

Name	Clark Oil & Refining Corp.	Name	Clark Oil & Refining Corp.
Address	8182 Maryland	Address	131st & Kedzie Ave.
City	St. Louis	City	Blue Island
State	MO	State	IL
Zip	63105	Zip	60406
Phone #	314/854-9696	Phone #	708/385-5000

PERSON(S) INTERVIEWED

TITLE**PHONE #**

	NAME	PHONE #
	Stafford Jacques	Asst. Dir. of Env. Control
	Ronald Snook	Envir. Specialist

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

John Maher	IEPA/EPs	708/531-5900

PREPARED BY

AGENCY/TITLE**PHONE #**

John Mater	IEPA/EP5	702/531-5900
------------	----------	--------------

[illegible][illegible][illegible]

USEPA #: 105109822
IEPA #: 031024005

Waste Name	Generating Process	Date of Last Analysis	USEPA Haz. Waste #	On 8700-12	On 3510-3	On Annual Report for:				Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
						1990	1989	1988					
HAZARDOUS WASTES													
Dissolved Air Flotation Floot	Residual from waste-water treatment for waste oil recovery	10/17/90	K048	YES	YES	G	G	G	NONE	VARIABLES	12/20/90	Avganics in Terre Haute, IN for reclamation.	
Slop Oil Emulsion Solids	Emulsified oil interface from oil/water separator	Included w/ above	K049	YES	YES	G	G	G	NONE	VARIABLES	11/1/89	Avganics in Terre Haute, IN for reclamation.	
Heat Exchanger Bundle Cleaning Sludge	Residual from cleaning of heat exchangers	Included w/ above	K050	YES	YES	G	G	G	NONE	VARIABLES	Shipped w/ other K-wastes	Avganics in Terre Haute, IN for reclamation.	
API Separator Sludge	Bottoms from API Separator	5/13/88	K051	YES	YES	G	G	G	NONE	VARIABLES	10/26/89	Avganics in Terre Haute, IN for reclamation.	
Mineral Spirits	Solvent parts washer	No analysis	0001			NO	NO	NO	NONE	Approx. 50 gallons per month	Not Manifested	Safety-Kleen picks up the solvent periodically for reclamation.	
1,1,1 Trichloroethylene	Dip tanks in electric shop and garage	No analysis	F001	N/A	N/A-Not Stored	YES	NO	NO	NONE	VARIABLES	10/10/90	Safety-Kleen in Dalton, IL for reclamation.	

Facility Name Ark Oil & Refining Corp.

USEPA #: J05109822

IEPA #: 0310240005

Waste Disposition Form

Waste Name	Generating Process	Date of Last Analysis	USEPA Haz. Waste #	On 8700-12	On 3510-3	On Annual Report for:			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
						1990	1989	1988				
NON-HAZARDOUS WASTES												
Sulfur Catalyst, Sand, Clay & Oil	From clean-up of spilled asphalt, etc.	9/24/90	NON-HAZ.	N/A	N/A	N/A	N/A	N/A	15 cubic yards	VARIES	10/31/89	CID Landfill in Calumet City, Illinois for land disposal.
Various Catalysts	Spent catalysts from the production of gasoline	12/18/90	NON-HAZ.	N/A	N/A	N/A	N/A	N/A	?	VARIES	Not Manifested	Cri-Met in Lafayette, LA for regeneration of the catalysts. (See narrative.)
Cooling Tower Basin Sludge	From cleaning of cooling towers	3/21/81	NON-HAZ.	N/A	N/A	N/A	N/A	N/A	NONE	INFREQUENT		CID Landfill in Calumet City, Illinois for land disposal.
Scrap Sulfur	Residual sulfur from cleaning pits or vessels	9/23/85	NON-HAZ.	N/A	N/A	N/A	N/A	N/A	NONE	INFREQUENT		CID Landfill in Calumet City, Illinois for land disposal.

NARRATIVE

Clark Oil & Refining Corp. has changed little since the last inspection (November 16, 1989), though there are some additions due to discovery of some regulated activities.

Clark Oil & Refining Corp. receives crude oil via pipeline, refines it, and produces many petroleum-related products such as gasoline, liquefied petroleum gas, asphalt, and different types of fuel oil. Some these products are stored temporarily on-site. These products are later loaded onto trucks at a nearby terminal for local distribution. Barges are also loaded with product at a dock on the river on the south end of the property. Some products are piped directly to one of several terminals for distribution.

Hazardous Wastes

1. Dissolved Air Flotation (DAF) float

- K048.
- residual material from wastewater treatment (waste oil recovery.).
- shipped with other K-wastes to Avganics in Terrehaute, IN for fuel blending..
- a shipment is made when it is determined that the DAF unit should be emptied of residual material.
- this waste is never accumulated on site.

2. Slop Oil Emulsion Solids

- K049
- emulsified oil interface from oil water separator.
- shipped with other K-wastes to Avganics in Terrehaute, IN for fuel blending.
- a shipment is made about every three to four months.
- this waste is never accumulated on site.

3. Heat Exchanger Bundle Cleaning Sludge

- K050
- residual material from cleaning of heat exchangers
- shipped with other K-wastes to Avganics in Terrehaute, IN for fuel blending.
- this waste is never accumulated on site.

4. API Separator Sludge

- K051
- bottoms from API separator
- no longer sent to Pollution Control Industries of America. Shipped with other K-wastes to Avganics in Terrehaute, IN for fuel blending.
- this waste is never accumulated on site.

Clark Oil & Refining Corp.
0310240005
February 1, 1991

5. Mineral Spirits

- D001
- generated from a Safety-Kleen parts cleaner.
- Safety-Kleen changes the solvent container for the parts cleaner approximately once a month.
- it was not previously manifested, but the site will be manifesting it in the future.
- this waste is never accumulated on site.

6. 1,1,1 Trichloroethane

- F001
- degreasing parts in the maintenance shop.
- Safety-Kleen picks this waste up when the solvent in the parts cleaner is spent.
- it is sent to Safety-Kleen in Dolton, IL for reclamation.
- this waste is not accumulated, since it is only picked up when the parts cleaner solvent is considered spent.

Non-Hazardous Wastes

1. Sulfur catalyst, sand , clay and oil

- generated from clean-up of spilled asphalt, etc.
- shipped to CID in Calumet City, IL for land disposal.
- a shipment is made when economically feasible (i.e., they have enough waste to warrant a shipment).
- approximately 30 cubic yards on site.

2. Various Spent Catalysts

- generated in the production of gasoline.
- shipped to Cri-Met in Lafayette, LA for recycling/recovery. This material is not manifested. The site does not consider this material waste since 1) it is very expensive and therefore must be reused, 2) they send it to be regenerated (not disposed) and the same material sent to Cri-Met is sent back to Clark Oil and 3) they have their employees follow the shipment to Cri-Met and back to insure that they receive their own catalysts.

Hazardous Waste Process Units

- S01 - Container Storage Area
- located on the western end of the site's property
 - outdoor unit, no building
 - soil base covered with gravel
 - no waste currently stored in this area

At the time of the inspection the following apparent violation was observed:

722.120(a) - Failure to manifest the waste mineral spirits.

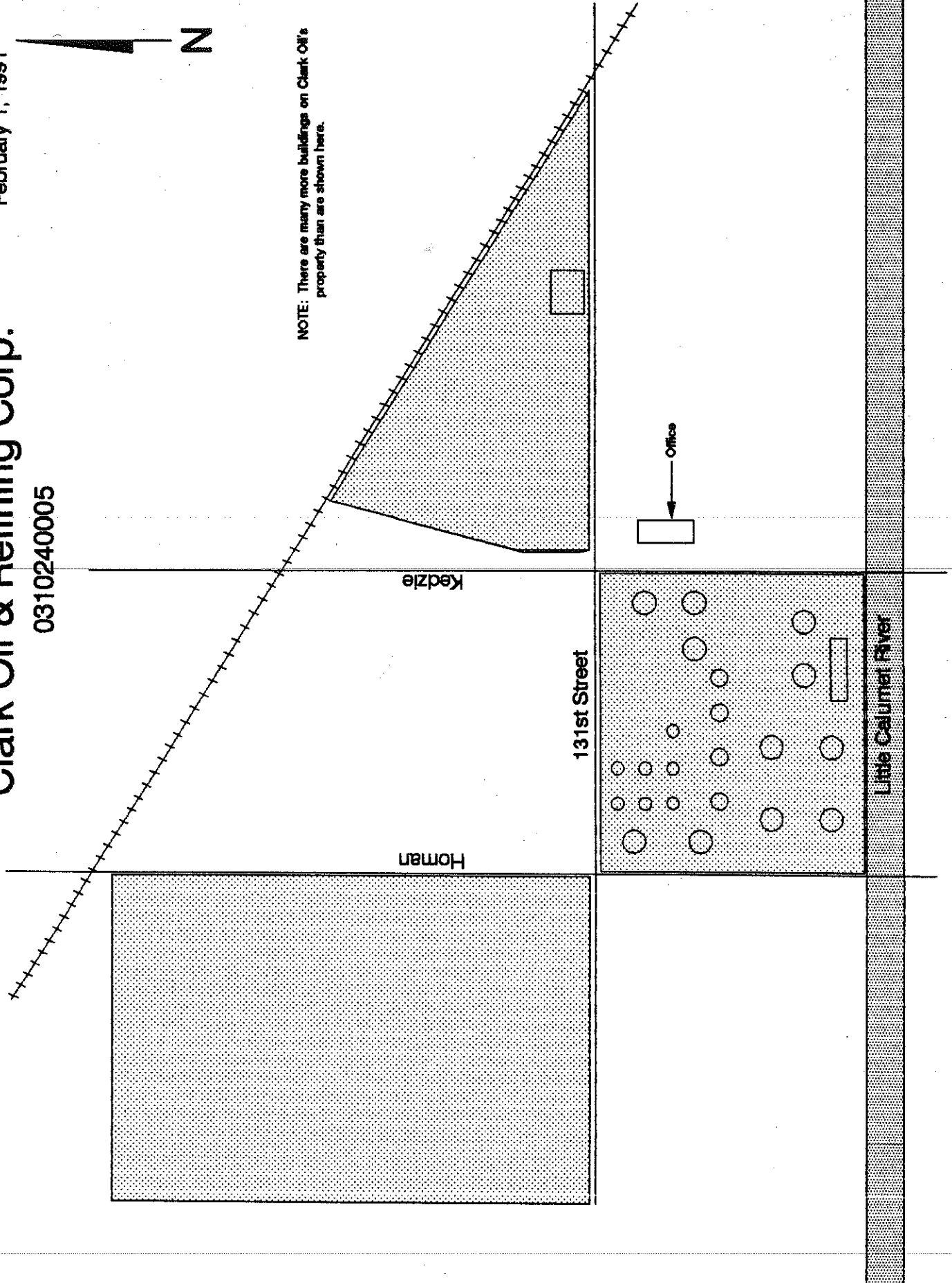
Clark Oil & Refining Corp.

0310240005

February 1, 1991

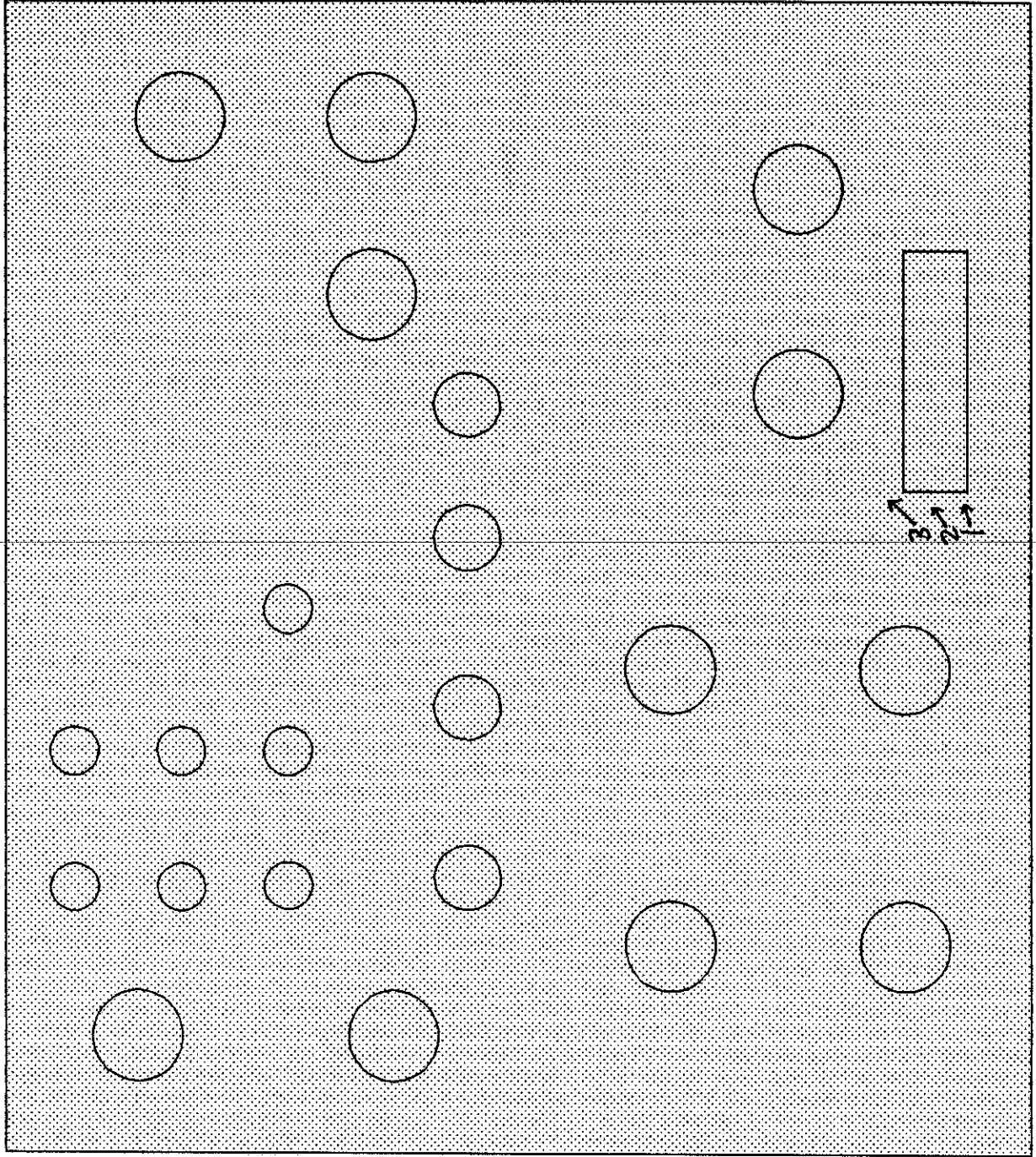


NOTE: There are many more buildings on Clark Oil's property than are shown here.



Clark Oil & Refining Corp. 0310240005

February 1, 1991



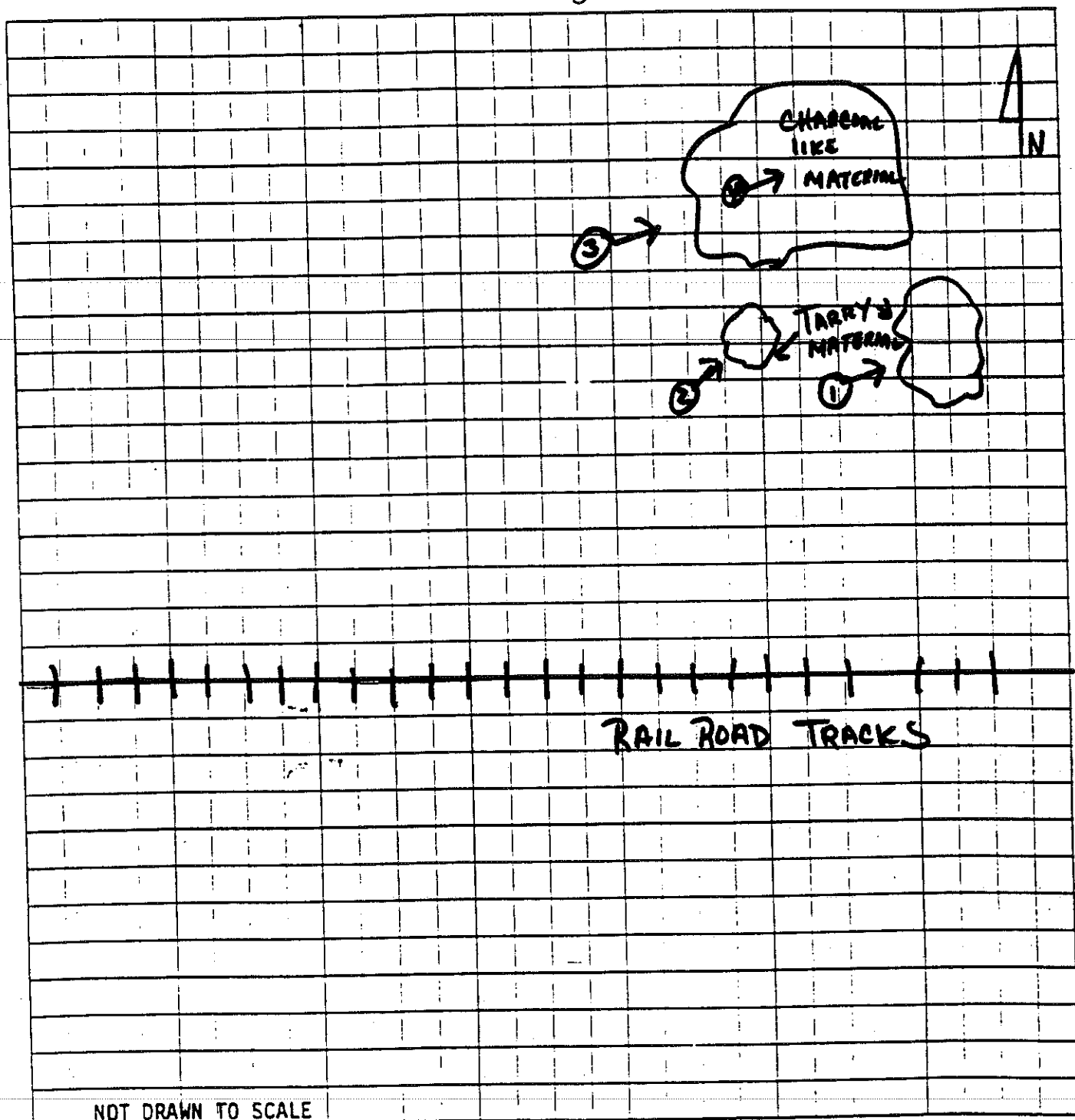
Little Calumet River



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: April Inspector: Aaron Taylor
Site Code: 031 024 0005 County: Cook
Site Name: Clark Oil And Refining Time: 10:30 Am - 11:15 Am



NOT DRAWN TO SCALE

JAN 08 1990

5HR-12

Mr. John Bernbom
Clark Oil & Refining Corporation
131st Street & Kedzie Avenue
Blue Island, Illinois 60406

Re: Land Disposal Restrictions
Clark Oil & Refining Corp.
ILD 005 109 822

Dear Mr. Bernbom:

On November 16, 1989, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents and dioxin-containing wastes became effective on November 8, 1986, for California List hazardous wastes on July 8, 1987, for the Second Third of hazardous wastes on August 8, 1988, and for the Second Third of hazardous wastes on June 8, 1989 (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

If you have any questions regarding this correspondence, please contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA-CMS
Glenn Savage, IEPA-FOS

bcc: Zetta L. Thomas

Z.Thomas:ev:12/26/89:Disk #3:PC FILENAME:bernbom

EV 1-5-89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	1/1/89	PSA 1-5-89	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: CLARK OIL & REFINING CORP.U.S. EPA I.D. No.: ILD 005 109 8220310240005Street: 131ST STREET AND KEDZIE AVENUECity: BLUE ISLAND State: ILLINOISZip Code: 60406Telephone: (708) 385-5000Operator: CLARK OIL & REFINING CORP.Street: 131ST STREET AND KEDZIE AVENUECity: BLUE ISLAND State: ILLINOISZip Code: 60406Telephone: (708) 385-5000Owner: CLARK OIL & REFINING CORP.Street: 8182 MARYLAND KEDZIE AVENUECity: ST. LOUIS State: MISSOURIZip Code: 63105Telephone: (314) 854-9696Inspection Date: 11/16/89 Time: 9:00am - 12:15pm Weather Conditions: 28°

Name	Affiliation	Telephone
Inspectors: <u>DONNA CZECH</u>	<u>IEPA</u>	<u>(708) 345-9780</u>

Facility Representatives:	<u>JOHN BERNBOM</u>	<u>(708) 385-5000</u>
	<u>STAFFORD JACQUES</u>	<u>(708) 385-5000</u>
	<u>RONALD SNOOK</u>	<u>(708) 385-5000</u>

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>
Transporter	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Treater	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Storer	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Disposer	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

RECEIVED

DEC 05 1989

IEPA/DLPC

Revised 9-26-88

RECEIVED

DEC 15 1989

OFFICE OF RCRA
Waste Management Division
U.S. EPA REGION 5
CHICAGO, IL 60646

INSPECTION SUMMARY

FOR FACILITY BACKGROUND, SEE RCRA NARRATIVE

AT THE TIME OF THE INSPECTION, THIS COMPANY APPEARED TO BE OPERATING IN COMPLIANCE WITH LAND DISPOSAL RESTRICTION REGULATIONS.

0310240005 - Cook County
Blue Island/Clark Oil & Refining Corp.
ILD005109822

Narrative

Clark Oil and Refining Corp. receives crude oil via pipeline, refines it, and produces many petroleum-related products such as gasoline, liquefied petroleum gas, asphalt, and different types of fuel oil. Some of these products are stored temporarily on-site. These products are later loaded onto trucks at a nearby terminal for local distribution. Barges are also loaded with product at a dock on the river on the south end of the property. Some products are piped directly to one of several terminals for distribution.

Hazardous Wastes

1. Dissolved air flotation (DAF) float (K048)
 - residual material from wastewater treatment for waste oil recovery
 - rate of generation varies
 - shipped with other K-wastes
 - a shipment is made when it is determined that the DAF unit should be emptied of residual material
 - no waste was on site
2. Slop oil emulsion solids (K049)
 - emulsified oil interface from oil water separator
 - rate of generation varies
 - shipped to EWR, Inc. in Coal City, Illinois for fuel blending
 - a shipment is made about every three to four months *Storage* →
 - no waste was on site
3. Heat exchanger bundle cleaning sludge (K050)
 - residual material from cleaning of heat exchangers
 - rate of generation varies
 - shipped with other K-wastes
 - a shipment is made when it is determined that heat exchangers should be emptied of residual material
 - no waste was on site
4. API separator sludge (K051)
 - bottoms from API separator
 - rate of generation varies
 - shipped to Pollution Control Industries in East Chicago, Indiana for fuel blending
 - a shipment is made when it is determined that the API separator should be emptied of residual material
 - no waste was on site

Non-Hazardous Wastes

1. Sulfur catalyst, sand, clay and oil
 - generated from clean-up of spilled asphalt, etc.
 - rate of generation varies
 - shipped to CID in Calumet City for land disposal
 - a shipment is made when economically feasible
 - approximately six cubic yards were on site in three roll-off boxes
2. Various spent catalysts
 - generated in the production of gasoline
 - rate of generation varies
 - shipped to Cri-Met in Lafayette, Louisiana for recycling/recovery
 - a shipment is made when economically feasible
 - 96 drums were on site
3. Cooling tower basin sludges
 - generated from cleaning of cooling towers
 - generation is periodic - cooling towers must be shut down completely in order to clean them
 - shipped to CID in Calumet City for land disposal
 - a shipment is made when economically feasible
 - no waste was on site
4. Scrap sulfur
 - residual material from cleaning of pits and vessels
 - generation is periodic - affected units must be shut down completely in order to clean them
 - shipped to CID in Calumet City for land disposal
 - a shipment is made when economically feasible
 - no waste was on site

Hazardous Waste Units

- S01 - Container Storage Area
- located on western end of property
 - outside, open area
 - soil base, covered with gravel
 - no waste in this area

Notes

The Part A application which was originally submitted by Clark Oil & Refining Corp. includes S01, S02, T01, and T04 for hazardous waste activity. As explained in the previous inspection report (12/22/87), the latter three activities have never occurred at this site. The regulated S01 unit is the result of inadvertent accumulation of a roll-off box containing a listed hazardous waste for longer than 90 days. Because the Agency considers the S01 unit to be RCRA-regulated, a closure plan for this unit is required.

The hazardous wastes generated by Clark Oil are not accumulated in containers or tanks. Periodically it is determined that various process units should be emptied of residual material. When the company is ready to dispose of this waste material, a transporter removes the waste directly from the process unit and loads it into a truck. Because hazardous waste is not accumulated on-site, Clark Oil is not subject to Section 722.134.

At the time of the inspection, Clark Oil & Refining Corp. was operating as a fully regulated generator. Representatives of Clark Oil expressed a desire to change the company's status from that of a storage facility to a generator only. The company's Part A permit can be withdrawn after the container storage area has been certified closed according to an Agency approved closure plan.

Apparent Violations

- 725.212(a) - No closure plan available for the regulated container storage area.
- 725.242(a) - No closure cost estimate available for the regulated container storage area.

DC:dfa:1261D

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u> <i>NONE GENERATED</i>					
1. F001	_____	_____	_____	_____	_____
2. F002	_____	_____	_____	_____	_____
3. F003	_____	_____	_____	_____	_____
4. F004	_____	_____	_____	_____	_____
5. F005	_____	_____	_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes *NONE GENERATED*

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

	Gen.	Treat	Store	Disp.	Trans.
Arsenic 500 mg/L	_____	_____	_____	_____	_____
Cadmium 100 mg/L	_____	_____	_____	_____	_____
Chromium VI 500 mg/L	_____	_____	_____	_____	_____
Lead 500 mg/L	_____	_____	_____	_____	_____
Mercury 20 mg/L	_____	_____	_____	_____	_____
Nickel 134 mg/L	_____	_____	_____	_____	_____
Selenium 100 mg/L	_____	_____	_____	_____	_____
Thallium 130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	_____	_____	_____	_____
--------	-------	-------	-------	-------

500 ppm	_____	_____	_____	_____
---------	-------	-------	-------	-------

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*					
K048*	✓				
K049*	✓				
K050*	✓				
K051*	✓				
K052*					
K060*					
K061*					
K062*					
K069*					
K071*					
K073*					
K083*					
K084					
K085					
K086*					
K087*					
K099*					
K100*					
K101*					
K102*					
K103*					
K104*					
K106*					
P001					
P004					
P005					
P010					
P011					
P012					
P015					
P016					
P018					

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009					

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010					
U012					
U016					
U018					
U019					
U022					
U029					
U031					
U036					
U037					
U041					
U043					
U044					
U046					
U050					
U051					
U053					
U061					
U063					
U064					
U066					
U067					
U074					
U077					
U078					
U086					
U089					
U103					
U105					
U108					
U115					
U122					
U124					

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

NONE GENERATED

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

- _____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
_____ Pharmaceutical wastewater containing spent methylene chloride
_____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

NONE GENERATED

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

_____ Yes _____ No _____ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

_____ Yes _____ No _____ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☒ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
<u>K048</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>K049</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>K050</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>K051</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

B. Waste Analysis

1. F-Solvent Wastes NONE GENERATED

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☐ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☐ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results. _____

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

_____ Yes _____ No _____ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes *NONE GENERATED*

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

_____ Yes _____ No _____ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

☒ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☒ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: K048, K049, K050, K051

How was this determination made?

- Knowledge of waste

☒ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. WASTE ANALYSES BY GULF COAST LABORATORIES

- TCLP

____ Yes ☒ No ____ NA

- Total Constituent Analysis

____ Yes ☒ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ☒ No ____ NA

- d. How does the generator test the waste when a process or waste stream changes?

PETROLEUM REFINING INDUSTRY: PROCESS DOES NOT
CHANGE; WASTE STREAMS DO NOT CHANGE

C. Management

1. On-Site Management

Is restricted waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

____ Yes ☒ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ____ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site treatment or storage facilities: EWB IN COAL CITY, ILLINOIS
POLLUTION CONTROL INDUSTRIES IN E. CHICAGO, INDIANA

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☒ Yes ☐ No ☐ NA

EFFECTIVE DATE:
8-8-90

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☒ No

NOTIFICATION IS
WRITTEN AS THOUGH
"LAND BAN"
WERE
CURRENTLY IN EFFECT
FOR THESE WASTES.

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number	_____ Yes	_____ No
The corresponding treatment standards and all applicable prohibitions	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Date the waste is subject to the prohibitions	_____ Yes	_____ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?
- _____ ☒ Yes _____ No

D. Demonstration and Certification -- "Soft Hammer" Wastes *NONE GENERATED*

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?
- _____ Yes _____ No
- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:
- | | | |
|--|-----------|----------|
| A list of facilities and facility officials contacted? | _____ Yes | _____ No |
| Addresses | _____ Yes | _____ No |
| Telephone Numbers | _____ Yes | _____ No |
| Contact dates | _____ Yes | _____ No |

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?
- _____ Yes _____ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data,
if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ ☒ No

If yes, list types of waste treatment units and processes:

Illinois Environmental Protection Agency
Division of Land Pollution Control

INSPECTION REPORT

USEPA #: IL <u>D 005109822</u>	EPA #: <u>0310240005</u>
Facility Name: <u>CLARK OIL AND REFINING CORP.</u>	Phone #: <u>(312) 385-5000</u>
Street Address: <u>131ST & KEDZIE AVENUE</u>	County: <u>COOK</u>
City: <u>BLUE ISLAND</u>	State: <u>ILLINOIS</u> Zip: <u>60406</u>
Region: <u>MAYWOOD</u>	Inspection Date: <u>11/16/89</u> From: <u>9:00am</u> To: <u>12:15pm</u>
Weather: <u>28°</u>	

TYPE OF FACILITY

Notified As: <u>G, TSD</u>	Regulated As: <u>G (S)</u>
LDF? <u>(Yes or No)</u> HPV? <u></u>	90-Day F/U Required?: YES <u></u> NO <u>✓</u>

TYPE OF INSPECTION

RCRA: <u>✓</u> Sampling: <u></u> Citizen Complaint: <u></u> Closed: <u></u> Other: <u></u>
Record Review: <u></u> Follow-Up to Inspection of: <u></u> Withdrawal: <u></u>

NON-REGULATED STATUS

SQG: <u></u> Claimed Nonhandler: <u></u> Other (Specify in Narrative): <u></u>
--

PART A

Notification Date: <u>8/18/80</u> , from (initial) or (subsequent) Notification.
Initial Part A Date: <u>11/18/80</u> Amended: <u>1/1/</u>
Part A Withdrawal requested: <u>2/18/88</u> Approved by (US)(IL) EPA: <u>1/1/</u>

PART B PERMIT APPLICATION N/A

Part B Permit called by (US)(IL) EPA on: <u>5/6/88</u> Permit Due: <u>11/8/88</u>
Part B Permit Submitted: <u>1/1/</u> Draft Permit Issued: <u>1/1/</u>

ENFORCEMENT N/A

Has firm been referred to:	USEPA? <u>No</u>	IAG? <u>No</u>	County SA? <u>No</u>
Date(s) of initial referral:	<u>1/1/</u>	<u>1/1/</u>	<u>1/1/</u>
USEPA CACO: <u>1/1/</u>	CAFO: <u>1/1/</u>	ALJ Decision: <u>1/1/</u>	
Referral to DOJ by USEPA: <u>1/1/</u>	Federal Court Order Issued: <u>1/1/</u>		
PCB Order Issued: <u>1/1/</u>	State Court Order Issued: <u>1/1/</u>		

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1987	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report		
							88	87	86
S01	YES	UNKNOWN	YES	No	No	N/A	N/A	N/A	N/A
S02	YES	UNKNOWN	No	N/A	No	N/A	N/A	N/A	N/A
T01	YES	UNKNOWN	No	N/A	No	N/A	N/A	N/A	N/A
T04	YES	UNKNOWN	No	N/A	No	N/A	N/A	N/A	N/A
						RECEIVED			
						DEC 05 1989			
						IFED/100			

SUMMARY OF APPARENT VIOLATIONS

OWNER

OPERATOR

PERSON(S) INTERVIEWED		OPERATOR	
Name	CLARK OIL & REFINING CORP.	Name	CLARK OIL & REFINING CORP.
Address	8182 MARYLAND	Address	131ST ST. & KEDZIE AVENUE
City	ST. LOUIS	City	BLUE ISLAND
State	MISSOURI	State	ILLINOIS
Zip	63105	Zip	60406
Phone #	(314) 854-9696	Phone #	(708) 385-5000

PERSON(S) INTERVIEWED

TITLE

PHONE #

	TITLE	PHONE #
STAFFORD JACQUES	ASST. DIR. OF ENV. CONTROL	(708) 385-5000
RONALD SNOOK	ENVIRONMENTAL SPECIALIST	(708) 385-5000
JOHN BERNBOM	DIR. OF ENV. CONTROL	(708) 385-5000

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

NAME		PHONE #
DONNA CZECH	IEPA / EPS	(708) 345-9780

PREPARED BY

AGENCY/TITLE**PHONE #**

	AGENCY/TITLE	PHONE #
DONNA CZECH	IEPA / EPS	(708) 345-9780

[illegible][illegible][illegible]

0310240005 - Cook County
Blue Island/Clark Oil & Refining Corp.
ILD005109822

Narrative

Clark Oil and Refining Corp. receives crude oil via pipeline, refines it, and produces many petroleum-related products such as gasoline, liquefied petroleum gas, asphalt, and different types of fuel oil. Some of these products are stored temporarily on-site. These products are later loaded onto trucks at a nearby terminal for local distribution. Barges are also loaded with product at a dock on the river on the south end of the property. Some products are piped directly to one of several terminals for distribution.

Hazardous Wastes

1. Dissolved air flotation (DAF) float (K048)
 - residual material from wastewater treatment for waste oil recovery
 - rate of generation varies
 - shipped with other K-wastes
 - a shipment is made when it is determined that the DAF unit should be emptied of residual material
 - no waste was on site
2. Slop oil emulsion solids (K049)
 - emulsified oil interface from oil water separator
 - rate of generation varies
 - shipped to EWR, Inc. in Coal City, Illinois for fuel blending
 - a shipment is made about every three to four months
 - no waste was on site
3. Heat exchanger bundle cleaning sludge (K050)
 - residual material from cleaning of heat exchangers
 - rate of generation varies
 - shipped with other K-wastes
 - a shipment is made when it is determined that heat exchangers should be emptied of residual material
 - no waste was on site
4. API separator sludge (K051)
 - bottoms from API separator
 - rate of generation varies
 - shipped to Pollution Control Industries in East Chicago, Indiana for fuel blending
 - a shipment is made when it is determined that the API separator should be emptied of residual material
 - no waste was on site

RECEIVED
DEC 05 1989
IEPA/DLPC

Non-Hazardous Wastes

1. Sulfur catalyst, sand, clay and oil
 - generated from clean-up of spilled asphalt, etc.
 - rate of generation varies
 - shipped to CID in Calumet City for land disposal
 - a shipment is made when economically feasible
 - approximately six cubic yards were on site in three roll-off boxes
2. Various spent catalysts
 - generated in the production of gasoline
 - rate of generation varies
 - shipped to Cri-Met in Lafayette, Louisiana for recycling/recovery
 - a shipment is made when economically feasible
 - 96 drums were on site
3. Cooling tower basin sludges
 - generated from cleaning of cooling towers
 - generation is periodic - cooling towers must be shut down completely in order to clean them
 - shipped to CID in Calumet City for land disposal
 - a shipment is made when economically feasible
 - no waste was on site
4. Scrap sulfur
 - residual material from cleaning of pits and vessels
 - generation is periodic - affected units must be shut down completely in order to clean them
 - shipped to CID in Calumet City for land disposal
 - a shipment is made when economically feasible
 - no waste was on site

Hazardous Waste Units

- S01 - Container Storage Area
- located on western end of property
 - outside, open area
 - soil base, covered with gravel
 - no waste in this area

Notes

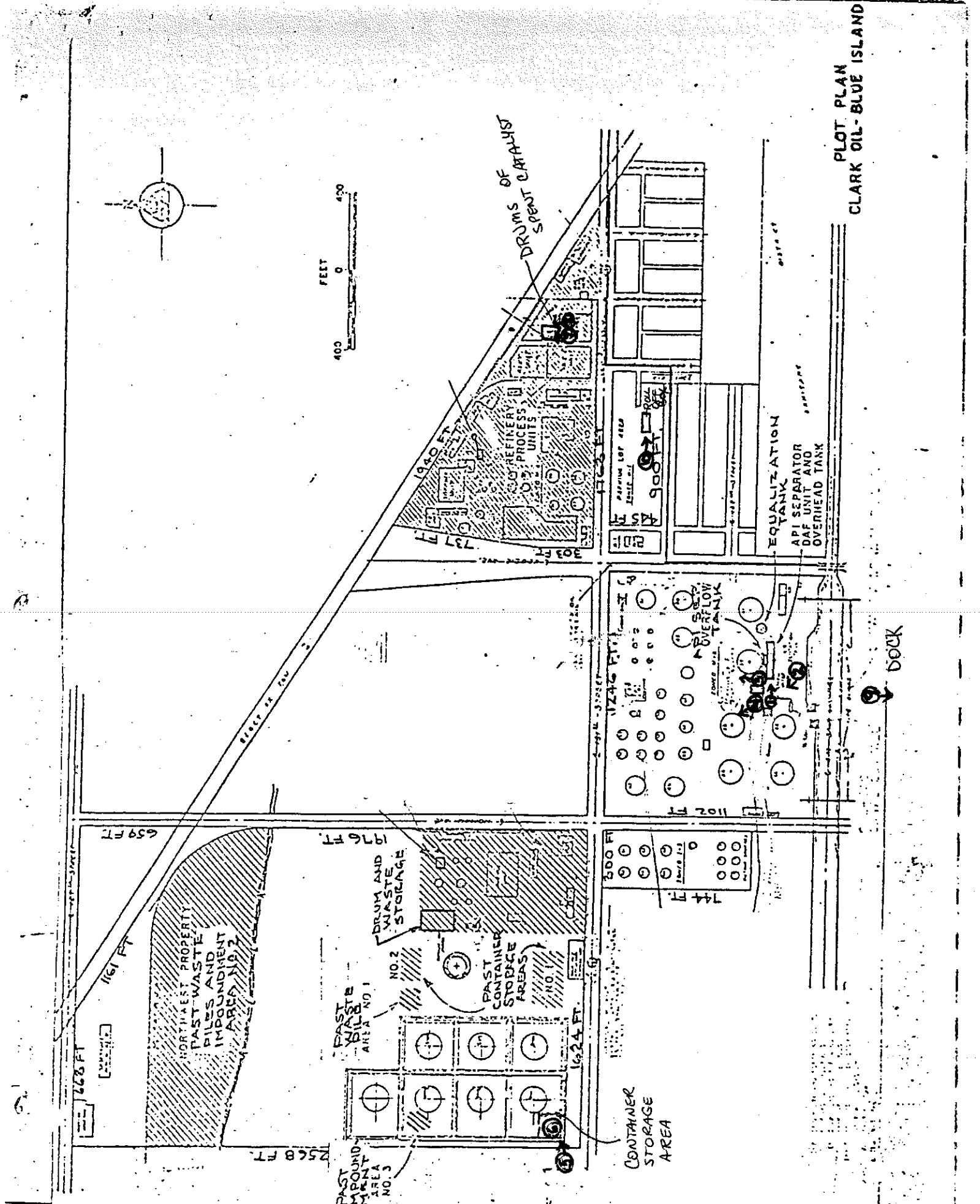
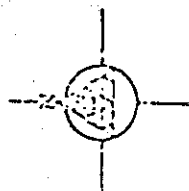
The Part A application which was originally submitted by Clark Oil & Refining Corp. includes SO1, SO2, T01, and T04 for hazardous waste activity. As explained in the previous inspection report (12/22/87), the latter three activities have never occurred at this site. The regulated SO1 unit is the result of inadvertent accumulation of a roll-off box containing a listed hazardous waste for longer than 90 days. Because the Agency considers the SO1 unit to be RCRA-regulated, a closure plan for this unit is required.

The hazardous wastes generated by Clark Oil are not accumulated in containers or tanks. Periodically it is determined that various process units should be emptied of residual material. When the company is ready to dispose of this waste material, a transporter removes the waste directly from the process unit and loads it into a truck. Because hazardous waste is not accumulated on-site, Clark Oil is not subject to Section 722.134.

At the time of the inspection, Clark Oil & Refining Corp. was operating as a fully regulated generator. Representatives of Clark Oil expressed a desire to change the company's status from that of a storage facility to a generator only. The company's Part A permit can be withdrawn after the container storage area has been certified closed according to an Agency approved closure plan.

Apparent Violations

- 725.212(a) - No closure plan available for the regulated container storage area.
- 725.242(a) - No closure cost estimate available for the regulated container storage area.



RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: CLARK OIL & REFINING CORP.
 U.S. EPA I.D. No.: ILD005109822 0310240005
 Street: 131ST STREET AND KEDZIE AVENUE
 City: BLUE ISLAND State: ILLINOIS Zip Code: 60406
 Telephone: (708) 385-5000
 Operator: CLARK OIL & REFINING CORP.
 Street: 131ST STREET AND KEDZIE AVENUE
 City: BLUE ISLAND State: ILLINOIS Zip Code: 60406
 Telephone: (708) 385-5000
 Owner: CLARK OIL & REFINING CORP.
 Street: 8182 MARYLAND
 City: ST. LOUIS State: MISSOURI Zip Code: 63105
 Telephone: (314) 854-9696
 Inspection Date: 11/16/89 Time: 9:00am-12:15pm Weather Conditions: 28°

Inspectors:	Name	Affiliation	Telephone
	<u>DONNA CZECH</u>	<u>IEPA</u>	<u>(708) 345-9780</u>

Facility Representatives:	Name	Telephone
	<u>JOHN BERNBOM</u>	<u>(708) 385-5000</u>
	<u>STAFFORD JACQUES</u>	<u>(708) 385-5000</u>
	<u>RONALD SNOOK</u>	<u>(708) 385-5000</u>

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>
Transporter	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Treater	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Storer	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Disposer	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

RECEIVED
 DEC 05 1989

IEPA/DLPC

Revised 9-26-88

INSPECTION SUMMARY

FOR FACILITY BACKGROUND, SEE RCRA NARRATIVE

AT THE TIME OF THE INSPECTION, THIS COMPANY APPEARED TO BE OPERATING IN COMPLIANCE WITH LAND DISPOSAL RESTRICTION REGULATIONS.

0310240005 - Cook County
Blue Island/Clark Oil & Refining Corp.
ILD005109822

Narrative

Clark Oil and Refining Corp. receives crude oil via pipeline, refines it, and produces many petroleum-related products such as gasoline, liquefied petroleum gas, asphalt, and different types of fuel oil. Some of these products are stored temporarily on-site. These products are later loaded onto trucks at a nearby terminal for local distribution. Barges are also loaded with product at a dock on the river on the south end of the property. Some products are piped directly to one of several terminals for distribution.

Hazardous Wastes

1. Dissolved air flotation (DAF) float (K048)
 - residual material from wastewater treatment for waste oil recovery
 - rate of generation varies
 - shipped with other K-wastes
 - a shipment is made when it is determined that the DAF unit should be emptied of residual material
 - no waste was on site
2. Slop oil emulsion solids (K049)
 - emulsified oil interface from oil water separator
 - rate of generation varies
 - shipped to EWR, Inc. in Coal City, Illinois for fuel blending
 - a shipment is made about every three to four months
 - no waste was on site
3. Heat exchanger bundle cleaning sludge (K050)
 - residual material from cleaning of heat exchangers
 - rate of generation varies
 - shipped with other K-wastes
 - a shipment is made when it is determined that heat exchangers should be emptied of residual material
 - no waste was on site
4. API separator sludge (K051)
 - bottoms from API separator
 - rate of generation varies
 - shipped to Pollution Control Industries in East Chicago, Indiana for fuel blending
 - a shipment is made when it is determined that the API separator should be emptied of residual material
 - no waste was on site

Non-Hazardous Wastes

1. Sulfur catalyst, sand, clay and oil
 - generated from clean-up of spilled asphalt, etc.
 - rate of generation varies
 - shipped to CID in Calumet City for land disposal
 - a shipment is made when economically feasible
 - approximately six cubic yards were on site in three roll-off boxes
2. Various spent catalysts
 - generated in the production of gasoline
 - rate of generation varies
 - shipped to Cri-Met in Lafayette, Louisiana for recycling/recovery
 - a shipment is made when economically feasible
 - 96 drums were on site
3. Cooling tower basin sludges
 - generated from cleaning of cooling towers
 - generation is periodic - cooling towers must be shut down completely in order to clean them
 - shipped to CID in Calumet City for land disposal
 - a shipment is made when economically feasible
 - no waste was on site
4. Scrap sulfur
 - residual material from cleaning of pits and vessels
 - generation is periodic - affected units must be shut down completely in order to clean them
 - shipped to CID in Calumet City for land disposal
 - a shipment is made when economically feasible
 - no waste was on site

Hazardous Waste Units

- S01 - Container Storage Area
- located on western end of property
 - outside, open area
 - soil base, covered with gravel
 - no waste in this area

Notes

The Part A application which was originally submitted by Clark Oil & Refining Corp. includes SO1, SO2, T01, and T04 for hazardous waste activity. As explained in the previous inspection report (12/22/87), the latter three activities have never occurred at this site. The regulated SO1 unit is the result of inadvertent accumulation of a roll-off box containing a listed hazardous waste for longer than 90 days. Because the Agency considers the SO1 unit to be RCRA-regulated, a closure plan for this unit is required.

The hazardous wastes generated by Clark Oil are not accumulated in containers or tanks. Periodically it is determined that various process units should be emptied of residual material. When the company is ready to dispose of this waste material, a transporter removes the waste directly from the process unit and loads it into a truck. Because hazardous waste is not accumulated on-site, Clark Oil is not subject to Section 722.134.

At the time of the inspection, Clark Oil & Refining Corp. was operating as a fully regulated generator. Representatives of Clark Oil expressed a desire to change the company's status from that of a storage facility to a generator only. The company's Part A permit can be withdrawn after the container storage area has been certified closed according to an Agency approved closure plan.

Apparent Violations

- 725.212(a) - No closure plan available for the regulated container storage area.
- 725.242(a) - No closure cost estimate available for the regulated container storage area.

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u> <i>NONE GENERATED</i>					
1. F001	_____	_____	_____	_____	_____
2. F002	_____	_____	_____	_____	_____
3. F003	_____	_____	_____	_____	_____
4. F004	_____	_____	_____	_____	_____
5. F005	_____	_____	_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes *NONE GENERATED*

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

	Gen.	Treat	Store	Disp.	Trans.
Arsenic 500 mg/L	_____	_____	_____	_____	_____
Cadmium 100 mg/L	_____	_____	_____	_____	_____
Chromium VI 500 mg/L	_____	_____	_____	_____	_____
Lead 500 mg/L	_____	_____	_____	_____	_____
Mercury 20 mg/L	_____	_____	_____	_____	_____
Nickel 134 mg/L	_____	_____	_____	_____	_____
Selenium 100 mg/L	_____	_____	_____	_____	_____
Thallium 130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	_____	_____	_____	_____
500 ppm	_____	_____	_____	_____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006°	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001°	_____	_____	_____	_____	_____
K004°	_____	_____	_____	_____	_____
K008°	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015°	_____	_____	_____	_____	_____
K016°	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018°	_____	_____	_____	_____	_____
K019°	_____	_____	_____	_____	_____
K020°	_____	_____	_____	_____	_____
K021°	_____	_____	_____	_____	_____
K022°	_____	_____	_____	_____	_____
K024°	_____	_____	_____	_____	_____
K025°	_____	_____	_____	_____	_____
K030°	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036°	_____	_____	_____	_____	_____
K037°	_____	_____	_____	_____	_____
K044°	_____	_____	_____	_____	_____
K045°	_____	_____	_____	_____	_____
K046°	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047°					
K048°	✓				
K049°	✓				
K050°	✓				
K051°	✓				
K052°					
K060°					
K061°					
K062°					
K069°					
K071°					
K073°					
K083°					
K084					
K085					
K086°					
K087°					
K099°					
K100°					
K101°					
K102°					
K103°					
K104°					
K106°					
P001					
P004					
P005					
P010					
P011					
P012					
P015					
P016					
P018					

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009					

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010					
U012					
U016					
U018					
U019					
U022					
U029					
U031					
U036					
U037					
U041					
U043					
U044					
U046					
U050					
U051					
U053					
U061					
U063					
U064					
U066					
U067					
U074					
U077					
U078					
U086					
U089					
U103					
U105					
U108					
U115					
U122					
U124					

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129					
U130					
U133					
U134					
U137					
U151					
U154					
U155					
U157					
U158					
U159					
U171					
U177					
U180					
U185					
U188					
U192					
U200					
U209					
U210					
U211					
U219					
U220					
U221					
U223					
U226					
U227					
U228					
U237					
U238					
U248					
U249					

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

NONE GENERATED

____ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

- ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
 ____ Pharmaceutical wastewater containing spent methylene chloride
 ____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

NONE GENERATED

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

____ Yes ____ No ____ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

____ Yes ____ No ____ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☒ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
K048		<input checked="" type="checkbox"/>
K049		<input checked="" type="checkbox"/>
K050		<input checked="" type="checkbox"/>
K051		<input checked="" type="checkbox"/>

B. Waste Analysis

1. F-Solvent Wastes *NONE GENERATED*

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☐ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☐ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate.

- TCLP

☐ Yes ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

_____ Yes _____ No _____ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes *NONE GENERATED*

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

_____ Yes _____ No _____ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

☒ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☒ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: K048, K049, K050, K051

How was this determination made?

Knowledge of waste

☒ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. WASTE ANALYSES BY GULF COAST LABORATORIES

- TCLP

___ Yes ☒ No ___ NA

- Total Constituent Analysis

___ Yes ☒ No ___ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

___ Yes ☒ No ___ NA

- d. How does the generator test the waste when a process or waste stream changes?

PETROLEUM REFINING INDUSTRY: PROCESS DOES NOT
CHANGE; WASTE STREAMS DO NOT CHANGE

C. Management

1. On-Site Management

Is restricted waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

___ Yes ☒ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ___ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ___ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site treatment or storage facilities: EUR IN COAL CITY, ILLINOIS
POLLUTION CONTROL INDUSTRIES IN E. CHICAGO, INDIANA

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☒ Yes ☐ No ☐ NA

EFFECTIVE DATE:
8-8-90

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☒ No

NOTIFICATION IS
WRITTEN AS THOUGH
"LAND BAN"
WERE
REVISED 9-26-88
CURRENTLY IN EFFECT
FOR THESE WASTES

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The corresponding treatment standards and all applicable prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Date the waste is subject to the prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☒ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes *NONE GENERATED*

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

☐ Yes ☐ No

b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Addresses	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Telephone Numbers	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Contact dates	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

____ Yes ____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

____ Yes ____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

____ Yes ____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i)	EPA Hazardous waste number	____ Yes	____ No
(ii)	Manifest number	____ Yes	____ No
(iii)	Waste analysis data, if available	____ Yes	____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

____ Yes ____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes ✓ No

If yes, list types of waste treatment units and processes:

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O 5 5 C
(1) (8) (9)

ILD005109822

OBSERVATION REPORT - SITE INVENTORY NO. 03102405

Cook

CO. - L.P.C.

Region # N

Date 04/02/82

Blue Island / Clark Oil

(Location)

(Responsible Party)

Letter Sent (Yes or No) N

Samples Taken: Yes () No (X)

Time: From 09:30 A m

Weather 45° cloudy (26)
rainy

Ground Water() Surface() Other()

To 10:30 A m

Photos Taken: Yes () No (X)

Interviewed R. Bruggink

Inspector B L E

Previous Inspection

3-24-82

Previous Correspondence

Letter of 3-24

Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

Operating (X)

Landfill ()

Storage ()

AUTHORIZATION:

Temporarily Closed ()

Random Dump ()

Salvage ()

E.P.A. Permit ()

Closed Not Covered ()

Other (X)

A.C.D. ()

Variance (X)

Closed and Covered ()

Quantity Received Date 1-6)

-

21(e) ()

Board Order ()

Illegal (5) ()

IMPROVED

SAME

DETERIORATED

RECEIVED
APR 08 1982
E.P.A. - D.L.P.C.
STATE OF ILLINOIS

LPC 4 1/79 5,000

I S or D 5
(62)

GENERAL REMARKS:

Cliff Gould accompanied me - R. Bruggink & S. Jacques were interviewed. Due to inconsistencies found during the ISS inspection of 3-24-82, a manifest check was scheduled for today. One waste - oil/water/solid mixture - has received several special waste permits - some of which used differing waste names & some of which labeled the waste as hazardous while others called it non-hazardous.

INTERVIEW:

One other waste, scrap resin, had been labeled hazardous - but under the RCRA definition, it isn't. This led to confusing manifests - those for the 1st waste stated non-haz, yet listed the hw number, and ID numbers & this info is required by RCRA. For the 2nd waste, haz. waste was on the form, yet there was no hw name. The manifest check revealed that the facility was filling out their manifests correctly. As to the oil/water/solid waste, it was determined that permits must have been using the "old" definition for haz. waste & only looked to the characteristics. As to the scrap resin, characteristics were once again looked at - phenols were too high, as per the "old" definition, so it was labeled haz. Also, all the permits thought to be for the oil/solid/water mixture, were. Each permit was for a different disposal site & each labeled the waste differently. When the permits come up for renewal, the facility will try to use the same name for each one & list the hw numbers.

DIAGRAM:

waste, it was determined that permits must have been using the "old" definition for haz. waste & only looked to the characteristics. As to the scrap resin, characteristics were once again looked at - phenols were too high, as per the "old" definition, so it was labeled haz. Also, all the permits thought to be for the oil/solid/water mixture, were. Each permit was for a different disposal site & each labeled the waste differently. When the permits come up for renewal, the facility will try to use the same name for each one & list the hw numbers.

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O S S C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 0310240

ILDOU5109822

Cook

CO. - L.P.C.

Region # N

Date 03/24/82

Blue Island

(Location)

Clark Oil

(Responsible Party)

Samples Taken: Yes () No ()

Time: From 10:00 A.M.

Weather 53° sunny

Ground Water() Surface() Other()

To 01:00 P.M.

Photos Taken: Yes () No ()

Interviewed R. Bruggink

Inspector B L F

Previous Inspection

Previous Correspondence

Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance (X)

Closed Not Covered ()

Other (X)

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

(30)

Board Order ()

Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

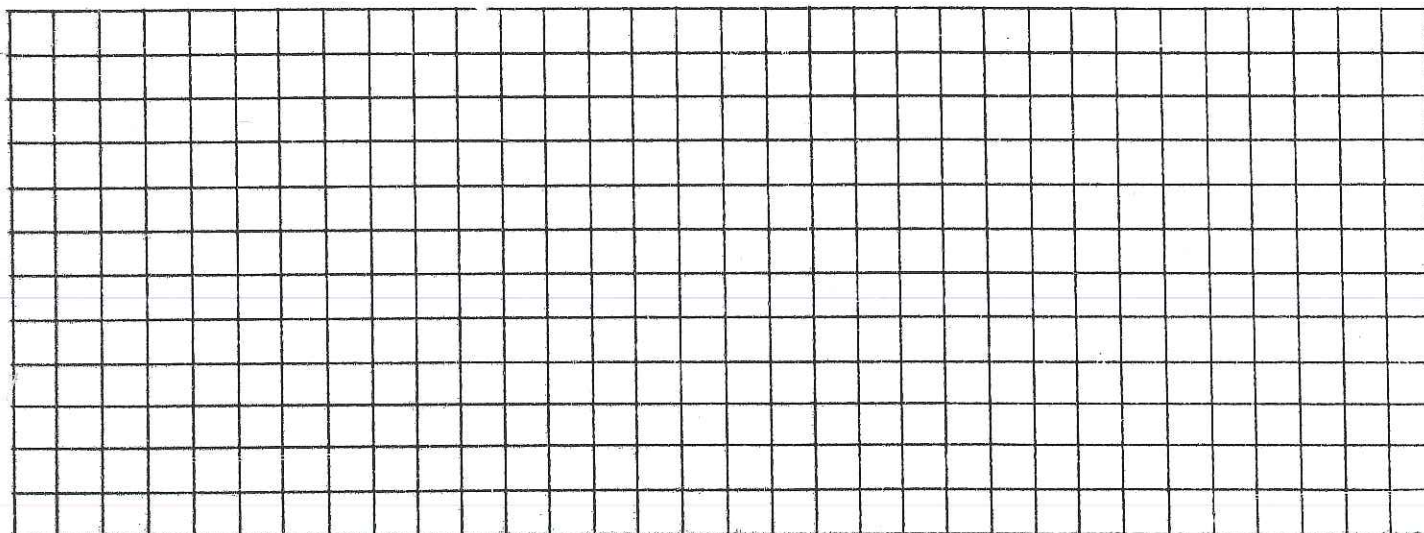
DETERIORATED

I S or D 5
(62)

GENERAL REMARKS: On ISS inspection was done at this facility on this date. Interviewed were R. Bruggink, J. Freeley & L. Jacques. The facility notified as a storage & treatment facility, being a refinery, crude petroleum oil is converted in gasoline, fuel oils & several petrochemicals. Four haz. wastes are generated: an oil/solid/water mixture which is listed hw - 15048, 49, 51; petroleum sludge - also a listed hw - 15048, 49, 51; loaded tank bottoms - 15052; and scrap

INTERVIEW: resin which has been labeled haz. on the permits due to a high phenol content - as under Ill's old definition of haz waste. Under the Federal definition, this waste would not be hazardous. In discussion of the facility, refer to the Remarks page of the ISS inspection report.

DIAGRAM:



L P C F C O 5 5 C

(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 03102404 ILDOU5109832

CO. - L.P.C.

Region # N

Date 7/24/92

(20)

(25)

Letter Sent (Yes or No) Y

(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No () Time: From 10 : 00 a m

Ground Water () Surface () Other () To 11 : 00 a m

Photos Taken: Yes () No () Interviewed K. Bruggink

Inspector

(27)

(29)

Previous Inspection

Previous Correspondence

Site Open: Yes () No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other (X)

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

Board Order ()

(30)

Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

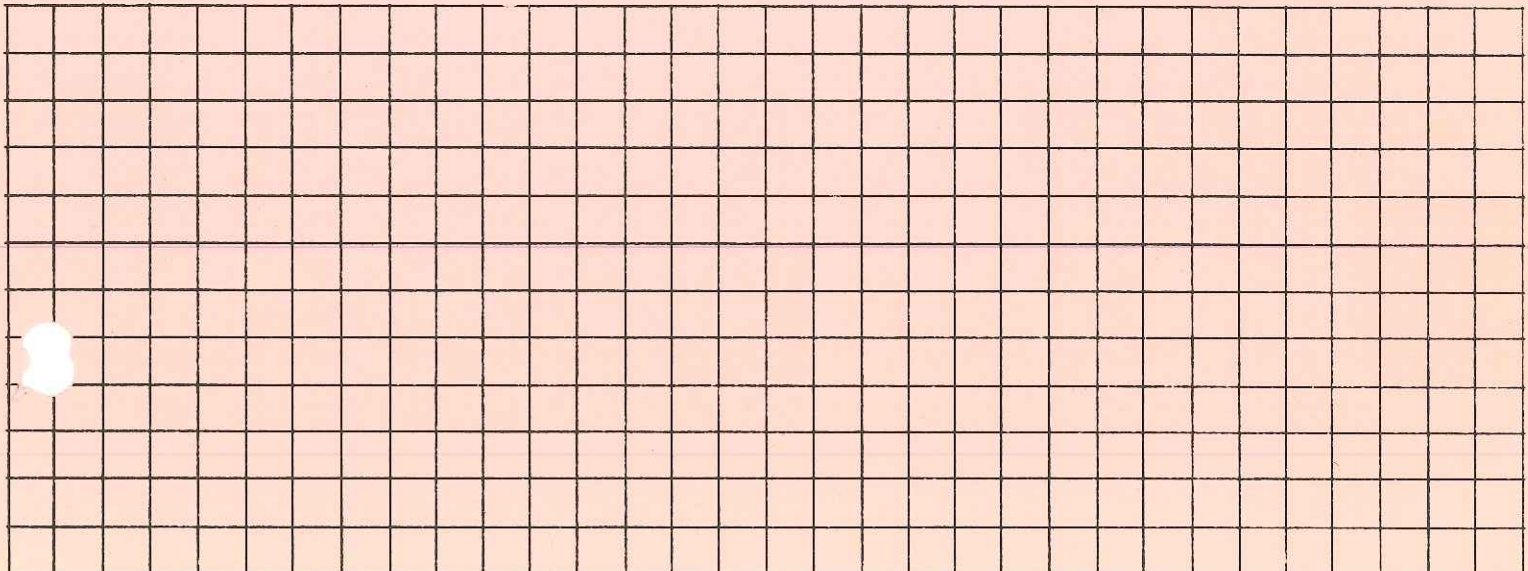
I S or D

(62)

GENERAL REMARKS:

INTERVIEW:

DIAGRAM:



ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O 5 5 C
(1) (8) (9)

INSPECTION REPORT - SITE INVENTORY NO. 03102405
(11) (18)

Cook CO. - L.P.C.

Region # N

Date 01/05/81

Blue Island

/ Clark Oil

(Location)

(Responsible Party)

Samples Taken: Yes () No (X)

Time: From 11:30 a.m.

Letter Sent (Yes or No) No

Ground Water () Surface () Other ()

To 12:05 p.m.

Weather Clear Cold 10°F

Photos Taken: Yes () No ()

Interviewed None

Inspector C

G

(27)

(29)

Previous Inspection 7/30/80

Previous Correspondence 9/4/80

Site Open: Yes () No (X)

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()

Landfill (X)

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) (X)

Closed and Covered (X)

Quantity Received Daily (1-6)

Board Order ()

Illegal (5) ()

RECEIVED

(30)

(31)

IMPROVED

SAME

JAN 14 1981

DETERIORATED

L.P.C. - U. P.C.
STATE OF ILLINOIS

I S or D

S

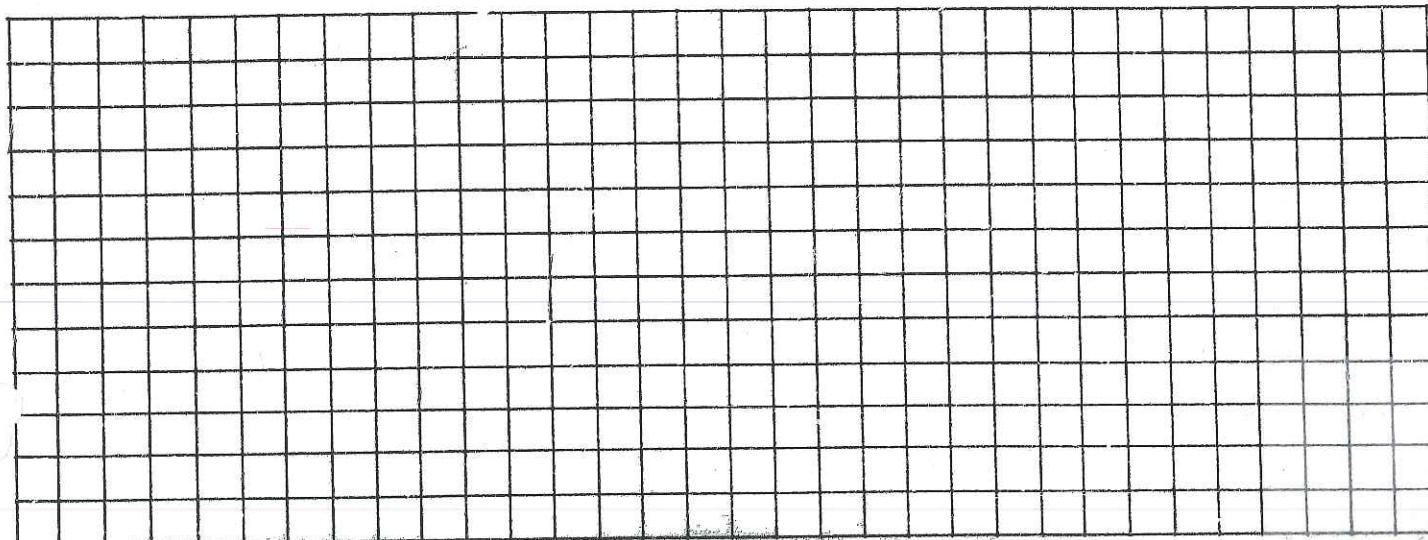
(62)

GENERAL REMARKS: This inspection report was conducted as the result of an inquiry from Ray Hanania, a reporter with the Southtown Sun. Newspapers. He had indicated that there was recent dumping at this site. The inspection disclosed that there was no recent dumping at the site. There was, however, evidence of discarded boxes of fire extinguisher refill, and 5-6 55 gal. fiber drums on the site. It appeared that those had been present for some time. The rest of the area is level, graded, and shows no evidence of recent dumping. See attached diagram

photo

INTERVIEW: for location of boxes (3)(4) fiber drums (1) and picture of general area (2).

DIAGRAM:



Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL 005109822 | IEPA #: 0310240005
 Facility Name: Clark Oil & Refining Co. | Phone #: 708/385-5000
 Street Address: 13100 S. Kedzie Ave. | County: Cook
 City: Blue Island | State: IL | Zip: 60406
 Region: Maywood | Inspection Date: 2/28/94 | From: 2:30 To: 3:15
 Weather: 25°, overcast

TYPE OF FACILITY

Notified As: G, T, S, D | Regulated As: G, (T), (S), (D)
 LDF? N HPV? N | 90-Day F/U Required?: yes no X

TYPE OF INSPECTION

CEI: Sampling: Citizen Complaint: X Closed: Other:
 CME/O&M: Record Review: Follow-Up to Inspection of: Withdrawal:

NON-REGULATED STATUS N/A

SOG: Claimed Nonhandler: Other (Specify in Narrative):

PART A

Notification Date: 8/18/80, from (Initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 | Amended: / /
 Part A Withdrawal requested: 2/18/80 | Approved by (US)(IL) EPA: / /

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N 5/6/88 | Final Permit Issued: / /

ENFORCEMENT N/A

Has the firm been referred to - USEPA: Y or N / /
 Illinois Attorney General: Y or N / / | County State's Attorney: Y or N / /

ORDERS ISSUED N/A

CACC: / / | CAFO: / / | Consent Decree: / /
 Federal Court Order: / / | State Court Order: / / | IPCB Order: / /

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1987	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC. Sec.	On Annual Report		
							19	19	19
S01	Y	Unknown	Y	Y	N	N/A	N/A	→	→
S02	↓	↓	↓	N/A	↓	↓	N/A	→	→
T01	↓	↓	↓	↓	↓	↓	N/A	→	→
T04	↓	↓	↓	↓	↓	↓	N/A	→	→

RECEIVED

APR 07 1994

IEPA-DLPC

OPERATOR

PERSON(S) INTERVIEWED

TITLE

PHONE #**INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

PREPARED BY

AGENCY/TITLE**PHONE #**

SUMMARY OF APPARENT VIOLATIONS *N/A*

DLPC COMPLAINT INVESTIGATION FORM

RR

C 0240005 - Cook
IEPA ID # CountyClark Oil & Refining Co
Site Name

FLD005109822 Complaint #: C94 - 155 N

USEPA ID #

FOS

Date Recvd: 1/5/94

By: CJ

By Phone: _____

In Person: _____

By Mail: ☒

Complainant: CCDEC & Tom Basso, USEPA

Respondent: Clark Oil - Ron Snook

Address: _____

Address: 13100 S. Kedzie Ave

Blue Island, IL 60406

Telephone: CCDEC 708/865-6165
Tom Basso unknown

Telephone: 708/385-5000 X 223

Directions to Source: _____

Complaint Details: Soil Contamination and oil spillage. See
attached

RECEIVED

MAR 07 1994

INVESTIGATION FINDINGS

IEPA-DLPC

Date Invest: 2-28-94 Time From: 2:30 To: 3:15

Reich
InspectorY
Photos

Interviewed: Ron Snook, Stafford Jacques Weather: 25°, overcast

Remarks: Looked at three loading areas. No evidence
of oil spillage. All three areas are curbed &
drained to facility wastewater treatment system.

Workers working on steam line complained of dizziness.
Could be due to benzene vapors, but not
confirmed by medical tests. Meters detected
some VOAs (low levels), but facility plans on
probing the area when weather clears. No
immediate evidence of benzene release
according to Mr. Snook. He will send me
a copy of test results when available. No
violations cited. Clark Oil incident report
attached.

Complainant Notified of Findings? Yes: ☒ No: _____

RECEIVED

Findings Entered into Computer: ☒CC: Northern Region File
Complaint File

APR 07 1994

IEPA-DLPC

7.8.94



EMERGENCY RESPONSE UNIT OFFICE OF CHEMICAL SAFETY - IEPA

PLEASE PRINT AND USE 24 HOUR TIME

ERU received: 10:25 01/05/94
Duty Officer: David Hertzog
relayed through USEPA Tom Basso

CALLER:

☒ anonymous ☐ keep confidential
phone (H) _____ (W) _____
address: _____

represents: ☐ self ☐ local government

TYPE OF PROBLEMS:

- ☐ air pollution/odor/open burning
☒ waste handling/dumping
☐ surface water pollution
☐ drinking water/utility name is:
☐ other _____

SOURCE: ☒ known ☐ suspected ☐ unknown

name _____
phone number _____
firm Clark oil Co.
street Int. of 131st + Kedzie
city Blue Island ☐ in ☐ near
county Cook
section _____ twp. _____ range _____

YES NO

☐ ☐ callers health affected, explain: _____

☐ ☐ callers property damaged

PROBLEM DESCRIPTION: Draining oil on
the ground after loading into
trucks
River could be impacted

FOLLOW UP / STATUS

Referred within IEPA: Region 2
Division: ☐ APC ☐ LPC ☐ PWS ☐ WPC
name: _____
time _____ date _____
If upgraded to incident IESDA#: _____
Closed by referral, hard copy sent: FAX 1-5-94
Closed w/o referral because: _____

LOG OF EVENTS ☐ over for additional information

4 A A A
COMPLAINT NUMBER

OCCURRENCES ☒ on going since

time _____ date _____
time _____ date _____
time _____ date _____

☐ other listed on back
frequency _____ per _____

ASK CALLER: (if applicable)

YES NO

- ☐ ☐ caller consulted doctor
☐ ☐ caller has photos, other evidence
☐ ☐ caller works or worked in past for alleged source
☐ ☐ caller has filed lawsuit or other claim against source
☐ ☐ caller has complained to source (date to whom and result) _____

☐ ☐ caller knows others affected
name _____
address _____
city _____
name _____
address _____
city _____

☐ ☐ more listed on back
caller willing to testify under oath at enforcement hearing

☐ ☐ send caller complaint forms
☐ sent _____/_____/_____ by _____

RELATED COMPLAINTS

☐ listed on back

☐ IEPA Response on-scene ☐ by phone

by: _____
time _____ date _____/_____/_____
results: _____

☐ Referred to other agency

agency: _____
name: _____
time _____ date _____/_____/_____
date _____/_____/_____

FILE NO. L 0 3 1 0 2 4 0 0 0 5

WITHHELD DOCUMENT NO. 009

*The original copy of this document
is contained in the withheld package.*

**WITHHELD
DOCUMENT**

FILE CATEGORY fos

DOCUMENT DATE 1/5/94



COOK COUNTY DEPARTMENT OF ENVIRONMENTAL CONTROL

MAYBROOK CIVIC CENTER

1500 MAYBROOK DRIVE • ROOM 202 • MAYWOOD, ILLINOIS 60153 • PHONE: 708/865-6165 • FAX NO.: 708/865-6361

RICHARD J. PHELAN, PRESIDENT
BOARD OF COUNTY COMMISSIONERS

Charles F. Lagges
Director

January 5, 1994

Mr. Cliff Gould
Illinois Environmental Protection Agency
1701 South First Avenue
Maywood, IL 60153

RECEIVED
JAN 10 1994
ILL. EPA - DLPC
STATE OF ILLINOIS

Dear Mr. Gould,

Our Department has received two separate complaints which would appear to fall under the Illinois Environmental Protection Agency (IEPA) Land Pollution Division authority.

The first complaint which I have already discussed with you on the telephone involves two workers who while digging a trench at Clark Oil refinery alleged to have been exposed to benzene vapors. The workers subsequently sought treatment at a medical facility and called the Occupational Safety and Health Administration (OSHA) who in turn informed the workers to call our Department. After receiving their complaint I telephoned Clark Oil and had my call returned by Ron Snook. Ron determined the workers were employed by Van Dyke Construction, an outside contracting firm. I informed Ron that I had also contacted Mr. Gould at the IEPA Land Division since this would appear to be a land pollution problem. Ron stated he would also contact Mr. Gould.

At this point there did not appear to be any continual release of benzene or additional exposures and Clark Oil knew of the incident, therefore the original exposure complaint was a safety issue and could best be handled by OSHA. I then called OSHA and was informed a complaint was filed with their office in Calumet City, but they could not release any other information due to worker confidentiality rights.

However, it would appear that there may be soil contamination on Clark Oil's site which could require land remediation. Our Department could then be involved at this time since our Ordinance requires a permit application for land remediation processes to be obtained, where air pollutants would be emitted to the atmosphere.

The second complaint is from [REDACTED]

[REDACTED] I have attached copies of two letters we have received concerning this matter. One letter is from Groebe Management and the other is from the Cook County Department of Public Health.

RECEIVED

APR 07 1994

IEPA-DLPC


RECEIVED

MAR 07 1994

IEPA-DLPC

Please inform me of any findings or actions that take place
in the future at these sites.

Sincerely,

A handwritten signature in cursive script that reads "William J. Franek". The signature is written in dark ink and is positioned below the word "Sincerely,".

William J. Franek, Ph.D., P.E., DEE

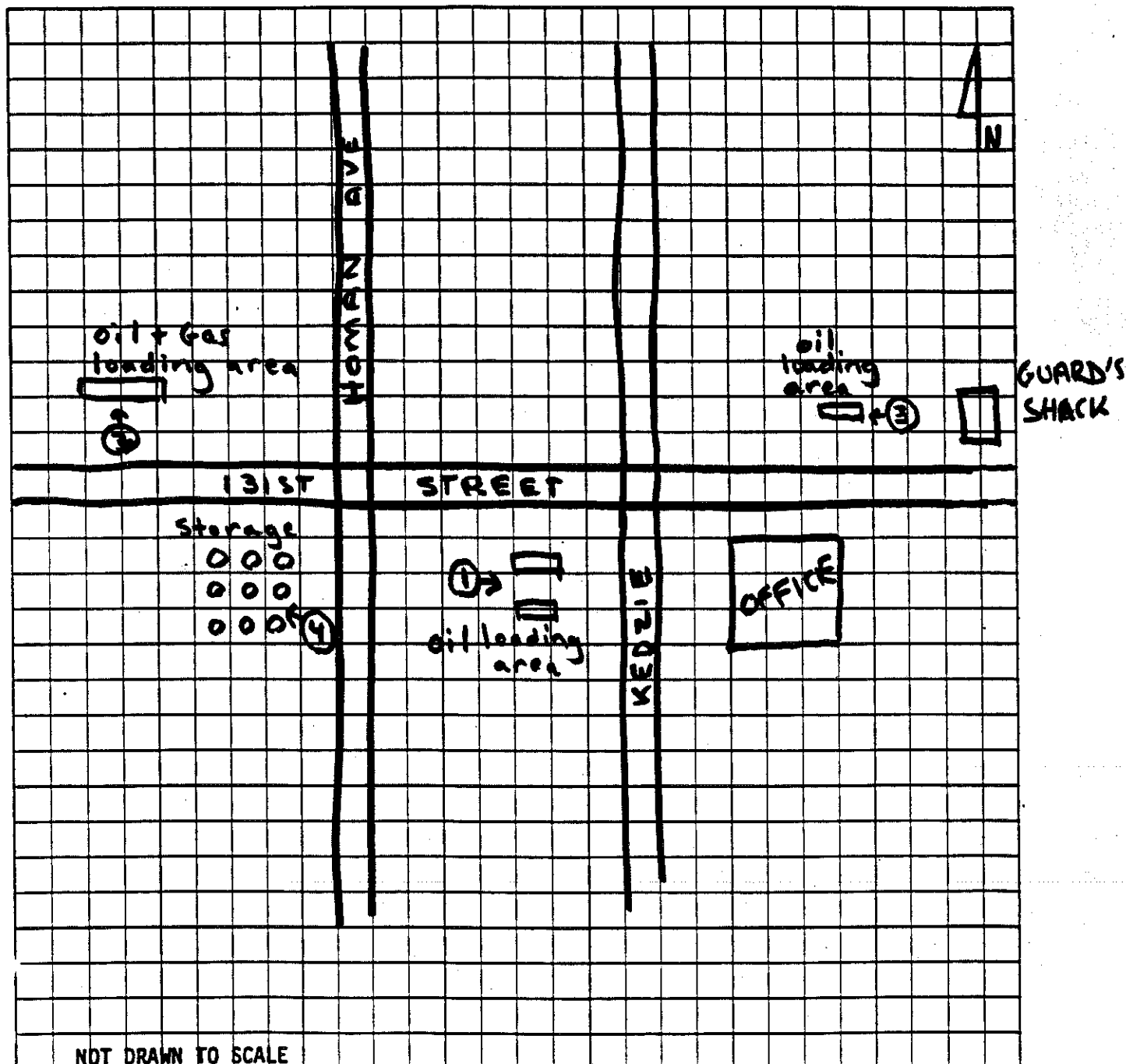
cc: Charles Lagges



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: 2/28/94 Inspector: R. Reich
Site Code: 0310240005 County: Cook
Site Name: Clark Oil + Refining Time: 3:00



call after noon

Called all day 1/6 - all circuits busy
" 1/6 - 10:30 AM - all circuits busy

1/4/94

Petty Officer Reeves

3:30 P.M.

708-789-5830 Ex 54

Re: Call to National Response Center Claiming Clark was
LOADING TRACKS & DRAINING LOADING ARMS ON THE
GROUND

FACT: LOADING ARMS ARE NORMALLY DRAINED INTO TRUCKS.
LOADING ~~TRUCKS~~ ^{ARMS} HAVE VACUUM BREAKERS. AREA IS CONCRETED
WITH DRAINS & SUMP which goes to refinery waste water
treatment system with oil/water separator. THE REFINERY REPROCESSES
collected oil.

Ron talked to Cliff Gould of IEPA, Maywood - LAND
Cliff said he had not heard anything from the NRC regarding
this.

Bob Llanes of the Clark environmental department visited the
the loading area at 4:00 P.M. He reported there was no visible
evidence of spills in the area. Bill Mack, supervisor in Products Movement
said the same thing as written above about the loading practices ⁱⁿ and
the area.

I talked with P.O. Reeves on 1/6/94 at 11:30 A.M. and told
him what is written above. He seemed satisfied with the explanation
saying he just wanted us to know.

J.G.

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O 5 5 C
(1) (8) (9)

INSPECTION REPORT - SITE INVENTORY NO.

03102405

Cook

Co. - L.P.C.

Region #

N
(19)

Date 073080
(18) (20) (25)

Blue Island Clark Oil

(Location)

(Responsible Party)

Letter Sent (Yes or No) Y
(26)

Samples Taken: Yes () No X

Time: From 03:10 PM

Weather Sunny 85 F

Ground Water () Surface () Other ()

To 03:50 PM

Photos Taken: Yes () No X

Interviewed

Inspector MWS
(27) (29)

Previous Inspection 1-25-80

Previous Correspondence 2-14-80

Site Open: Yes () No X

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()

Sanitary Landfill X

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) X

Closed and Covered X

Quantity Received Daily (1-6)

(30)

Board Order ()

Illegal (5) ()

SITE EVALUATION

Leachate:	Ponded on site (X)	32
	Flowing on site (X)	33
	Seeping (X)	34
	Evidence of past flows (X)	35
	Observed garbage () refuse () in standing water (X)	36
	Flow entering surface water (5)	37
	Flow leaving site (1-3)	38
Open Burning:	Observed (5)	39
	Underground fire (5)	40
	Evidence of recent open burning (5)	41
	Insufficient fire protection equipment provided (2)	42
Daily Cover:	Not provided on previously deposited refuse (5)	43
	Not provided on previous operating day (4)	44
	Inadequate depth over entire area (3)	45
	Inadequate depth over only a portion of area (1-2)	46
Intermediate Cover:	Inadequate depth in portion(s) () or entire () required areas (1-3)	47
Final Cover:	Inadequate depth in some areas (1-3)	48
	Inadequate depth over entire area 60 days after area closure (4)	49
	None 60 days after area closure (5)	50
	Unloading not supervised (3)	51
	Refuse not deposited at toe of slope ()	
	Inadequate spreading and compacting ()	
	Insufficient operable equipment on site as required () (2 ea. 2-8)	52
	Operational roads unsatisfactory ()	
	Blowing litter (), dust nuisance observed (), Odor detected () (1 ea. 1-3)	53
	Permit () Board Order () Violation noted (2 ea. 2-4)	54
	Liquids () Solids () not permitted (5)	55
	Inadequate site restriction () Site concealment () (2 ea. 2-4)	56
	Inadequate: Shelter () Sanitary Facilities () Emergency Communications () (1 ea. 1-3)	57
	Scavenging by: Operator () Others () observed (1-3)	58
	Salvaging Observed (): Improperly conducted in: Location () Operation () Storage () (1-3)	59
	Evidence of vectors observed () (1-3)	60
	Animal feeding observed () (1-3)	61

RECEIVED

AUG 25 1980

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Local Compliance X Improvement Needed () Improvement Observed ()

Signature of operator does not necessarily imply agreement with the above noted observations.

WASTE MATERIALS HAVE BEEN REMOVED AND/OR COVERED.

Signature

Owner/Operator

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 03102405 IL D005109822

Cook

CO. - L.P.C.

Region # N

Date 03/24/82

Blue Island

Clark Oil

(Location)

(Responsible Party)

Samples Taken: Yes () No () Time: From 10:00 A m

Ground Water () Surface () Other () To 01:00 P m

Photos Taken: Yes () No () Interviewed R. Bruggink

Letter Sent (Yes or No) Y

Weather 53° sunny

Inspector B L F

Previous Inspection

Previous Correspondence

Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance (X)

Closed Not Covered ()

Other (X)

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

(30)

Board Order ()

Illegal (5) ()

IMPROVED

LPC 4 1/79 5,000

SAME

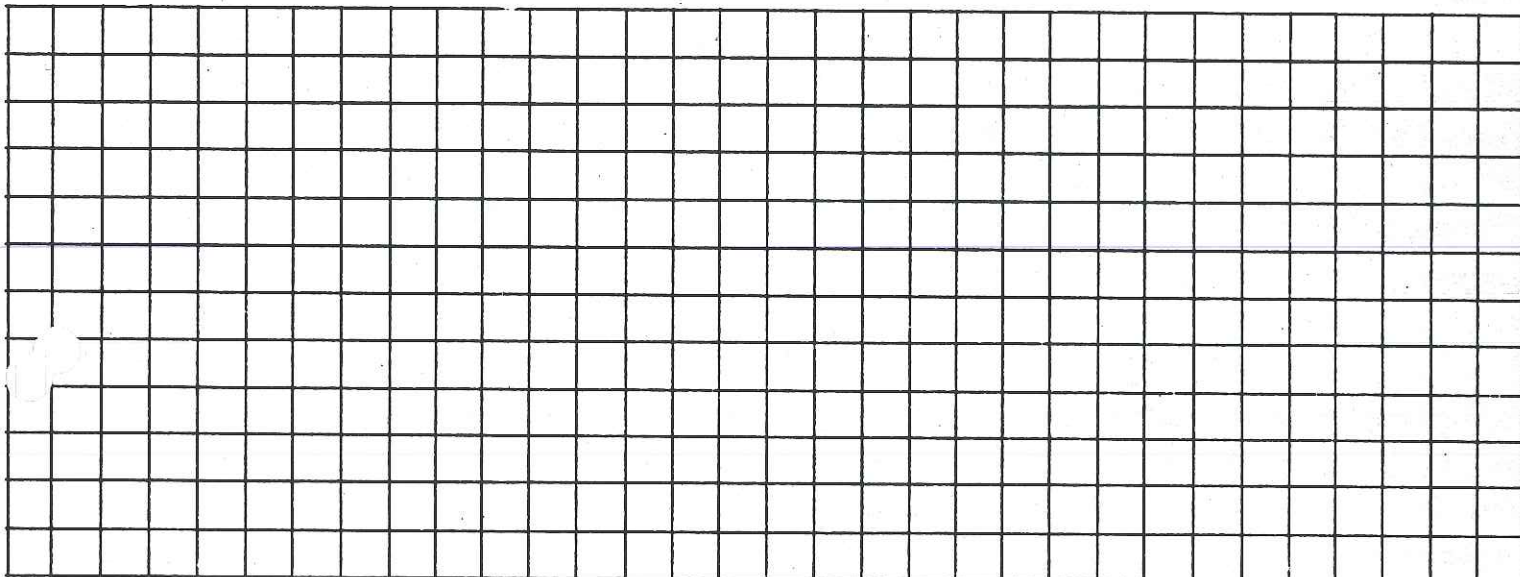
DETERIORATED

I S or D 5

GENERAL REMARKS: On ISS inspection was done at this facility on this date. Interviewed were R. Bruggink, J. Freeley & S. Jacques. The facility notified as a Storage & treatment facility. Being a refinery, crude petroleum oil is converted in gasoline, fuel oils & several petrochemicals. Four gas wastes are generated: an oil/solid/water mixture which is listed hw - K048, 49, 51; petroleum sludge - also a listed hw - K048, 49, 51; leaded tank bottoms - K052; and scrap

INTERVIEW: resin which has been labeled haz. on the permits due to a high phenol content - as under old's old definition of hazardous. Under the Federal definition, this waste would not be hazardous. For discussion of the facility, refer to the Remarks page of the ISS inspection report.

DIAGRAM:



L P C F C O 5 5 C
(1) (8) (9)

ILD005/09822

OBSERVATION REPORT - SITE INVENTORY NO. 031024005

(11)

(18)

Cook

CO. - L.P.C.

Region # N

Date 04/02/82

(20)

(25)

Blue Island / Clark Oil

Letter Sent (Yes or No) N

(26)

Samples Taken: Yes () No (X) Time: From 09:30 A m

Weather 45° cloudy rainy

Ground Water () Surface () Other () To 10:30 A m

Photos Taken: Yes () No (X) Interviewed R. Bruggink

Inspector B L E

(27)

(29)

Previous Inspection 3-24-82 Previous Correspondence letter of 3-24 Insp. Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance (X)

Closed Not Covered ()

Other (X)

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily (1-6) -

(30)

Board Order ()

Illegal (5) ()

(31)

IMPROVED

SAME

DETERIORATED

LPC 4 1/79 5,000

I S or D S

(62)

GENERAL REMARKS:

Cliff Gould accompanied me - R. Bruggink & S. Jacques were interviewed. Due to inconsistencies found during the TSS inspection of 3-24-82, a manifest check was scheduled for today. One waste - oil/water/solid mixture - has received several special waste permits - some of which used differing waste names & some of which labeled the waste as hazardous while others called it non-hazardous.

INTERVIEW:

One other waste, scrap resin, had been labeled hazardous - but under the RCRA definition, it isn't. This led to confusing manifests - those for the 1st waste stated non-haz yet listed the hw number, the FD numbers & other info as required by RCRA. For the 2nd waste, haz waste was on the forms yet there was no hw name. The manifest check revealed that the facility was filling out their manifests correctly. As to the oil/water/solid

DIAGRAM:

waste, it was determined that Permitors had been using the "old" definition for haz. waste & only looked to the characteristic. As to the scrap resin, characteristics were once again looked at - phenols were too high, as per the "old" definition, so it was labeled haz. Also, all the permits thought to be for the oil/solid/water mixture, were. Each permit was for a different disposal site & each labeled the waste differently. When the permits come up for renewal, the facility will try to use the same name for each one & list the hw numbers.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

CLARK OIL & REFINERY

MEMORANDUM

TO: Div. File DATE: 10-7-87

FROM: Jane Squires ☐ Information only

SUBJECT: FOIA Request from Theresa L. May ☐ Response requested
Dated June 23, 1987

On Aug 17 1987 I called Theresa May to schedule a file review - she indicated that she wasn't sure client was still interested but would check & call me back.

On Sept 15, 1987 requestor was again contacted by phone to schedule file review. On Sept 16, 1987 requestor called & left message information was no longer needed.

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O 5 5 C

(1) (8) (9)

INSPECTION REPORT - SITE INVENTORY NO. 03102405

(11)

(18)

Cook CO. - L.P.C.

Region # N

Date 01/05/81

(20)

(25)

Blue Island

/ Clark Oil

(Location)

(Responsible Party)

Letter Sent (Yes or No) No

(26)

Samples Taken: Yes () No (X)

Time: From 11:30 am

Weather Clear Cold 10°F

Ground Water () Surface () Other ()

To 12:05 pm

Photos Taken: Yes () No ()

Interviewed None

Inspector C

(27)

G

(29)

Previous Inspection 7/30/80

Previous Correspondence 9/4/80

Site Open: Yes () No (X)

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()

Landfill (X)

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) (X)

Closed and Covered (X)

Quantity Received Daily (1-6)

Board Order ()

Illegal (5) ()

(30)

(31)

IMPROVED

RECEIVED

JAN 14 1981

SAME

DETERIORATED

L.P.C. - U.P.C.

I S or D

S

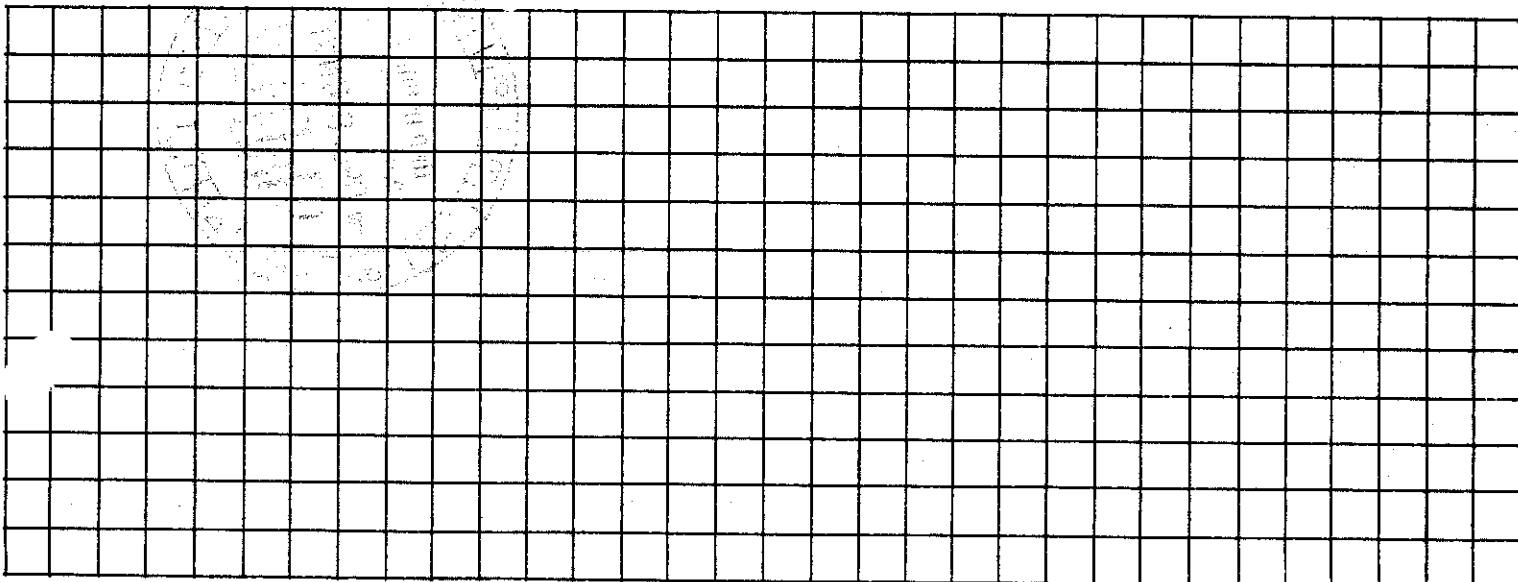
(62)

STATE OF ILLINOIS

GENERAL REMARKS: This inspection report was conducted as the result of an inquiry from Ray Hanania, a reporter with the Southtown Sun. Newspapers. He had indicated that there was recent dumping at this site. The inspection disclosed that there was no recent dumping at the site. There was, however, evidence of discarded boxes of fire extinguisher refill, and 5-6 55 gal. fiber drums on the site. It appeared that these had been present for some time. The rest of the area is level, graded, and shows no evidence of recent dumping. See attached diagram photo

INTERVIEW: for location of boxes (3,4) fiber drums 1 and picture of general area (2).

DIAGRAM:



ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O 5 5 C
(1) (8) (9)

INSPECTION REPORT - SITE INVENTORY NO. 03102405

COOK Co. - L.P.C. Region # N Date 012580
Blue Island / Clark Oil (Location) (Responsible Party)
Samples Taken: Yes () No ☒ Time: From 01:30 m To 02:15 m Weather clear 25°F
Ground Water () Surface () Other ()
Photos Taken: Yes () No ☒ Interviewed Bernhard Bruggink Inspector M W S
(26) (27) (29)

Previous Inspection 12-17-80 Previous Correspondence 1-8-80 Site Open: Yes () No ☒
OPERATIONAL STATUS: TYPE OF OPERATION: AUTHORIZATION:
Operating ☒ Sanitary Landfill ☒ Storage () E.P.A. Permit ()
Temporarily Closed () Random Dump () Salvage () Variance ()
Closed Not Covered () Other () A.C.D. () 21(e) ()
Closed and Covered () Quantity Received Daily (1-6) 1 Board Order ()
(30) Illegal (5) ☒ 5
(31)

SITE EVALUATION

Leachate: Pondered on site (X) 32
Flowing on site (X) 33
Seeping (X) 34
Evidence of past flows (X) 35
Observed garbage () refuse () in standing water (X) 36
Flow entering surface water (5) 37
Flow leaving site (1-3) 38
Open Burning: Observed (5) 39
Underground fire (5) 40
Evidence of recent open burning (5) 41
Insufficient fire protection equipment provided (2) 42
Daily Cover: Not provided on previously deposited refuse (5) 43
Not provided on previous operating day (4) 44
Inadequate depth over entire area (3) 45
Inadequate depth over only a portion of area (1-2) 46
Intermediate Cover: Inadequate depth in portion(s) () or entire () required areas (1-3) 47
Final Cover: Inadequate depth in some areas (1-3) 48
Inadequate depth over entire area 60 days after area closure (4) 49
None 60 days after area closure (5) 50
Unloading not supervised (3) 51
Refuse not deposited at toe of slope ()
Inadequate spreading and compacting ()
Insufficient operable equipment on site as required () (2 ea. 2-8) 52
Operational roads unsatisfactory ()
Blowing litter (), dust nuisance observed (), Odor detected () (1 ea. 1-3) 53
Permit () Board Order () Violation noted (2 ea. 2-4) 54
Liquids () Solids () not permitted (5) 55
Inadequate site restriction () Site concealment () (2 ea. 2-4) 56
Inadequate: Shelter () Sanitary Facilities () Emergency Communications () (1 ea. 1-3) 57
Scavenging by: Operator () Others () observed (1-3) 58
Salvaging Observed (): Improperly conducted in: Location () Operation () Storage () (1-3) 59
Evidence of vectors observed () (1-3) 60
Animal feeding observed () (1-3) 61

RECEIVED

FEB 06 1980

E.P.A. - D.L.P.C.

STATE OF ILLINOIS

* WOOD, METAL, PAPER
* CONCRETE, ASPHALT

General Compliance () Improvement Needed ☒ Improvement Observed ☒

700 DRUMS HAVE BEEN REMOVED
signature of operator does not necessarily imply agreement with the above noted observations.
* CLARK OIL OFFICIALS SAID THEY BELIEVE THE OTHER MATERIALS ON
SITE CONSIST OF, SULPHUR, CATALYSTS, COAL, FILTER SAND, RESIN,
WATER AND OIL AND SODA ASH SLURRY.
Signature _____ Owner/Operator _____



ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS
INTER-OFFICE CORRESPONDENCE

RECEIVED

DATE: 1-25-80
MEMO TO: File 03102405
FROM: Mary Wang Schroeder
SUBJECT: COOK COUNTY - D.L.P.C. Inspection
Blue Island / Clark Oil

FEB 06 1980

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

GENERAL REMARKS:

Visited the site with John Bernhom, Clark Attorney and Robert Bruggink, Director of Environmental Control. Approximately 700 drums have been removed. One half of them went to a reconditioner and one half

INTERVIEW:

went to a salvage yard. Bruggink also indicated that 40 twenty yard boxes of general refuse has been removed from the site. I asked Bruggink to identify the materials listed in previous inspections. He said he believed the wastes were as follows:

DIAGRAM:

follows: yellow solid - sulphur

LPC-19

RED BROWN CRYSTAL - RESIN

BLUE-WHITE CRYSTAL - CATALYSTS

LIQUID - OIL WATER MIX

WHITE SOLID - SODA ASH SLURRY

LARGE AGGREGATE BLACK SOLID - COAL

SMALL AGGREGATE BLACK SOLID - FILTER SAND

An area of about 30' x 100' is still covered with general refuse. Concrete and asphalt have been deposited throughout the area. I told Bruggink and Bernhom that the materials other than general refuse or demolition debris will have to be analyzed, permitted and tracked to its destination with manifests. I also told them that the general refuse and demo debris may be covered with 2' of soil or removed. Bruggink and Bernhom determined that the procedure to follow would be 1) get metal, wood and general refuse out 2) get analyses and permits for other materials 3) dispose of special wastes 4) spread concrete & cover. They said items 3 & 4 would have to be pursued in the spring.